

Five-Year Review Report

First Five-Year Review Report
For the
Coleman Operable Unit of the 29th and Mead Site
Wichita
Sedgwick County, Kansas

September 2005

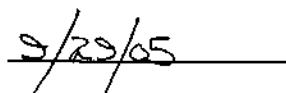
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SUPERFUND RECORDS

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List of Acronyms

ARARs	Applicable or Relevant and Appropriate Requirements
BRA	Baseline Risk Assessment
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
DCE	Dichloroethene
EPA	Environmental Protection Agency
gpm	Gallons per Minute
GTI	Ground Water Technology, Inc.
KDHE	Kansas Department of Health and Environment
MCLs	Maximum Contaminant Levels
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
ND	Non Detect
NIC	North Industrial Corridor
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
NRMRL	National Risk management Research Laboratory
O&M	Operation and Maintenance
ORD	Office of Research and Development
ppb	Parts Per Billion
PCE	Tetrachloroethylene
PRP	Potentially Responsible Party
RCRA	Resource Conservation Recovery Act
RD/RA	Remedial Design/Remedial Action
RI/FS	Remedial Investigation/Feasibility Study
ROD	Record of Decision
SARA	Superfund Amendments and Reauthorization Act
SVE	Soil Vapor Extraction
TCA	Trichloroethane
TCE	Trichloroethylene
VOC	Volatile Organic Compound
mg/Kg	Milligrams per Kilogram
mg/L	Milligrams per Liter
$\mu\text{g}/\text{Kg}$	Micrograms per Kilogram
$\mu\text{g}/\text{L}$	Micrograms per Liter

Executive Summary

The first five-year review of the Coleman Operable Unit (OU) of the 29th and Mead Superfund site in Wichita, Kansas, was completed in March 2005. The results of the five-year review indicate that the remedy is protective of human health and the environment. The remedy consists of ground water extraction and treatment, ground water monitoring, and soil vapor extraction (SVE). The semiannual ground water monitoring program was implemented to evaluate contaminant concentration and hydraulic control. The SVE consists of an expansion of the existing system to remediate other sources within the OU. The trigger for this five-year review was the actual start of construction on March 9, 2000, of the SVE system.

The assessment of this five-year review found that the remedy was constructed and implemented in accordance with the requirements of the Record of Decision (ROD). The remedy has been functioning as designed, but the review has determined that areas along the west side of the OU be studied to determine if adjustments to the ground water remedy are needed to prevent migration of contaminants off the Coleman OU. The current ground water remedy (extraction and treatment of contaminated ground water) will be part of the final area-wide ground water remedy for the North Industrial Corridor Site (NIC) (which includes the 29th and Mead site) by eventually restoring the ground water to acceptable quality (Safe Drinking Water Act Maximum Contaminant Levels [MCLs]). Additional remedial action steps will be necessary to address the ground water plume that is beyond the limits of the Coleman OU. The soil remedy is further reducing the threat of continued contamination of the ground water from the soil source with the expansion of the SVE system.

Recommendations for the Coleman OU include: 1) A review of the ground water remedy needs to be completed to determine if adjustments are necessary to insure the capture of contamination from the OU area; 2) continue the ground water monitoring compliance program to confirm hydraulic control of the ground water contaminant plume; 3) continued collection of quarterly SVE systems performance data to evaluate system operation; and 4) continue collection of air stripper performance data to evaluate percent removal for each treatment system and the air emission rates of each treatment system.

The potentially responsible parties (PRPs) are evaluating the SVE system to determine if operation of parts of the system should be discontinued. Volatile organic compound (VOC) concentrations and removal rates at all of the areas being addressed by the SVE systems are exhibiting an asymptotic trend. The PRPs may approach EPA to perform soil sampling to evaluate the effectiveness of the SVE systems regarding removal of contaminant mass from the soil. This information in addition to the asymptotic trend may result in a request to discontinue operation of some of the SVE systems.

Five-Year Review Summary Form

SITE IDENTIFICATION

Site Name (from WasteLAN): 29th and Mead Coleman Operable Unit Superfund Site

EPA ID (from WasteLAN): KSD007241656

Region: 7	State: Kansas	City/County: Wichita, Sedgwick County
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SITE STATUS

NPL Status: Final Deleted Other (specify)

Remediation Status (choose all that apply): Under Construction Operating Complete

Multiple OUs? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Construction Completion Date: NA
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Has site been put into reuse? YES NO

REVIEW STATUS

Reviewing Agency: EPA State Tribe Other Federal Agency

Author Name: William Bunn and Kenneth Rapplean

Author Title: Environmental Scientist/Environmental Engineer	Author Affiliation: Environmental Protection Agency
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Review Period: September 2004 to March 2005

Date(s) of Site Inspection: September 23, 2004

Type of Review: Statutory
 Policy (Post-SARA Pre-SARA NPL-Removal only
 Non-NPL Remedial Action Site NPL State/Tribe-lead
 Regional Discretion)

Review Number: 1 (first) 2 (second) 3 (third) Other (specify)

Triggering Action:

Actual RA Onsite Construction at OU# OU02 Actual RA Start at OU# 01
 Construction Completion Previous Five-Year Review Report
 Other (specify)

Triggering Action Date (from WasteLAN): 3/9/00

Due Date (five years after triggering action date): 3/9/05

Five-Year Review Summary Form

Deficiencies: The review determined that some additional study of the capture zone along the west side of the operable unit needs to be completed to determine if any adjustments to the ground water remedy need to be considered. This is not considered a deficiency in the remedy.

Recommendations and Follow-up Actions:

Actions needed to ensure protectiveness is maintained and address the deficiency in the future are as follows:

Continue the semiannual ground water monitoring program to assure hydraulic containment of volatile organic compound contamination.

Review the ground water remedy to determine if adjustments need to be considered to insure the capture of contamination from the operable unit.

Continue to collect air stripper performance data to evaluate percent removal and air emission rates for the treatment systems.

Conduct an evaluation of the soil vapor extraction systems to determine if continued operation is appropriate.

Protectiveness Statement(s):

The remedy at the Coleman Operable Unit of the 29th and Mead Superfund site is protective of human health and the environment through removal of soil volatile organic compound contamination by the soil vapor extraction system and hydraulic containment of ground water contamination by the ground water remedial system.

Long-term protectiveness of the remedial action will be verified by ground water sampling to verify hydraulic containment by the ground water remediation system. A review of the ground water remedy will be completed to insure that the remedy is functioning as required to maintain hydraulic containment. Current monitoring data indicate that the soil vapor extraction system continues to remove soil contamination.

Other Comments:

1.0 INTRODUCTION

The U.S. Environmental Protection Agency (EPA) has conducted the first five-year review for the remedial actions (RAs) implemented at the Coleman Operable Unit (OU) of the 29th and Mead Superfund site in Wichita, Kansas. This review covers the period of time from September 2004 to March 2005. This report documents the results of the review.

The purpose of the five-year review is to determine whether the remedy at the site is protective of human health and the environment. The methods, findings, and conclusions of the reviews are documented in five-year review reports. In addition, five-year review reports identify deficiencies found during the review, if any, and recommendations to address them.

This five-year review is required by statute. The EPA must implement five-year reviews consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). CERCLA §121(c), as amended, states:

If the President selects a remedial action that results in any hazardous substances, pollutants or contaminants remaining at the site, the President shall review such remedial action no less often than every five years after the initiation of such remedial action to assure that human health and the environment are being protected by the remedial action being implemented.

The NCP, part 300.400(f)(4)(ii) of the Code of Federal Regulations (CFR) states:

If a remedial action is selected that results in hazardous substances, pollutants, or contaminants remaining at the site above levels that allow for unlimited use and unrestricted exposure, the lead agency shall review such action no less often than every five years after the initiation of the selected remedial action.

This is the first five-year review for the Coleman OU of the 29th and Mead Superfund site in Wichita, Kansas. The triggering action for this statutory review is the date of the initiation of onsite construction as shown in EPA's WasteLAN database: March 9, 2000. The Coleman OU of the 29th and Mead Superfund site in Wichita, Kansas, meets the requirements for a statutory five-year review because hazardous substances, pollutants, and contaminants may remain onsite above levels that allow for unlimited use and unrestricted exposure.

The 29th and Mead Superfund site in Wichita, Kansas, consists of two OUs: 1) the General Area OU, and 2) the Coleman OU. The Kansas Department of Health and Environment (KDHE) is the lead agency for the General Area OU. The EPA is the lead agency for the Coleman OU. Separate five-year reviews will be conducted for the General Area OU which is currently in the Remedial Investigation/Feasibility Study (RI/FS) stage.

2.0 SITE CHRONOLOGY

The chronology of events for the Coleman OU of the 29th and Mead Superfund site is provided in the following tables.

2.1 Administrative of Events

Date	Event
September 29, 1992	Record of Decision for Coleman Operable Unit signed
February 18, 1994	Consent Decree for Remedial Design/Remedial Action entered

2.2 Ground Water Remediation System

Date	Event
January 22, 1996	Remedial Design Work Plan approved
May 3, 1996	Pre-final Remedial Design submitted
August 3, 1996	Pre-final Remedial Design and Remedial Action Work Plan approved
August 21, 1996	Final Remedial Design submitted
October 14, 1996	Installation of RW-2 completed
October 17, 1996	Well development of RW-2 completed
October 18, 1996	Installation of transfer line piping
October 28, 1996	Air stripper modifications completed
October 30, 1996	Installation of well pump and plumbing
March 21, 1997	Final system inspection
April 1997	System startup

2.3 Soil Vapor Extraction System

Date	Event
October 7, 1997	Remedial Design Work Plan submitted
October 21, 1997	Remedial Design for Work Plan approved
March 12, 1999	Pre-final Remedial Design and Remedial Action Work Plan submitted
July 6, 1999	Pre-final Remedial Design and Remedial Action Work Plan approved
August 18, 1999	EPA approval of final Remedial Design/Remedial Action Work Plan and EPA notice to proceed
March 9, 2000	Initiate construction of Soil Vapor Extraction system
April 3, 2000	Complete construction for Soil Vapor Extraction system
May 4, 2000	Final system inspection
May 15, 2000	Soil Vapor Extraction system startup
Ongoing	Soil Vapor Extraction system monitoring

3.0 SITE BACKGROUND

3.1 Physical Characteristics

The Coleman OU is located within the north-central part of the 29th and Mead Superfund site, a 1,440-acre industrial area in north-central Wichita, Kansas (see Figure 1). The Coleman OU is occupied by York UPG, Inc., at 801 East 37th Street North, and by Recreational Vehicle Products (RV Products), located at 3010 North Mead Street (see Figure 2). The southern boundary of the Coleman OU is approximately 300 feet south of East 30th Street North.

The Coleman OU lies within the Arkansas River lowlands section of the central lowlands Physiographic Province, which is characterized as relatively flat. Unconsolidated deposits underlying the Coleman OU are approximately 40 feet in depth and consist of clay, silt, sand, and gravel. These deposits represent at least four major depositional episodes, which range in age from the Early Pleistocene to Recent Alluvium. The Wellington Formation, which comprises the impermeable bed beneath the unconsolidated deposits, consists of calcareous gray and blue shale containing several thin beds of argillaceous limestone, gypsum, and anhydrite.

These unconsolidated deposits are the primary source of usable ground water in Sedgwick County. The direction of ground water flow in the unconsolidated materials is generally south, although there are local variations caused by the pumping of a recovery well and

several industrial wells currently operating on the Coleman OU. Each industrial well has an average pumping rate of approximately 250 gallons per minute (gpm), and one of the wells must always be in operation to support York operations. Ground water flow velocity is estimated at 340 feet per year.

3.2 Land and Resource Use

The Coleman OU is located in an area which has been used primarily for industrial purposes since 1887. Various operations at the Coleman OU property prior to Coleman's occupation of the property include the manufacture of railway cars, automobiles, light aircraft, and electronically-controlled aircraft. Coleman acquired the property in 1947 from the Trustee of Culver Aircraft Corporation through a bankruptcy proceeding. Coleman initiated the manufacture of household furnace and air conditioning units at the Coleman OU property in 1949.

York purchased the northern part of the Coleman OU property in 1995 and is the current owner/operator of these facilities. York operations include the production of consumer furnaces and air conditioning systems intended for use in conventional residences and manufactured homes. The remainder of the Coleman property was purchased in 1987 by RV Products, which manufactures air conditioners for recreational vehicles. York occupies the former Coleman Heating, Ventilation, and Air Conditioning facility which includes a manufacturing plant (North Plant) that occupies approximately 60 percent of the Coleman OU, and an Administration and Engineering (A&E) Building which occupies approximately 30 percent of the Coleman OU. The remaining 10 percent of the Coleman OU area is occupied by RV Products.

The Coleman OU is surrounded by other industrial facilities such as a cardboard box manufacturer, a meat packing facility, a structural concrete manufacturer, grain elevators, a chemical manufacturing company, a railroad track, a petroleum products packaging facility, and the location of a former metals fabricating company.

3.3 History of Contamination

The EPA, the United States Geological Survey (USGS), and KDHE began investigating ground water contamination in the 29th and Mead area in 1983. These investigations revealed the presence of several volatile organic compounds (VOCs), including trichloroethylene (TCE), carbon tetrachloride, toluene, benzene, ethylbenzene, methylene chloride, trans and/or cis 1,2 dichloroethylene, vinyl chloride, and 1,1,1-trichloroethane (TCA) in the ground water at the 29th and Mead site. In May 1987, several water samples were collected at the Coleman facility from the effluent of cooling water from two onsite industrial water wells. The results of this sampling indicated elevated levels of several VOCs, which included TCE, TCA, and 1,1 dichloroethene. These results prompted an investigation at the Coleman OU to determine the source, magnitude, and extent of these contaminants. Successive investigations conducted between 1987 and 1988, which included monitoring well installation and sampling, soil gas surveys, aquifer tests, and pilot tests indicated several potential source areas for VOC contamination existed at the Coleman facility.

3.4 Initial Response

In 1988, Coleman and KDHE agreed that a ground water recovery and treatment program and a soil vapor extraction (SVE) program should be designed and implemented to control further migration of contaminants from the Coleman OU property. This system became operational in 1988 and included a 62-point SVE system to treat contaminated soils in a 65,000 square foot area and a ground water recovery and treatment system that currently utilizes two 40-foot by 4-foot diameter air strippers. Water from the system, subsequent to treatment, is discharged to the Wichita Drainage Canal in conformance with a National Pollutant Discharge Elimination System (NPDES) permit that was issued by KDHE.

The 29th and Mead Superfund site, which includes the entire Coleman facility, was officially listed on the Superfund National Priorities List (NPL) on February 21, 1990. The Coleman Company was identified as one of the potentially responsible parties (PRPs) for the 29th and Mead Superfund site. The Coleman Company and Evcon Industries asked KDHE and EPA to consider the area covered by the interim ground water and SVE system as an OU within the 29th and Mead Superfund site since an interim recovery system was operational prior to the 1990 NPL listing. An OU is any action taken within an area of a site as one part of an overall site cleanup. On June 6, 1991, a Consent Agreement was signed between KDHE and the Coleman Company requiring a RI/FS at the Coleman OU.

In 1994, the city of Wichita filed a petition requesting that EPA reopen the record for the NPL listing process. The EPA initially denied the city's petition. However, because the city had demonstrated its ability to organize a response action at the Gilbert and Mosley site, a state deferral demonstration project, EPA decided in April 1995 to remove the 29th and Mead site from the NPL. This action was on the condition that the city and KDHE enter into an agreement requiring the city to ensure cleanup of the site. The city and KDHE signed an order in October 1995 in which the city agreed to be responsible for site investigation and cleanup. The boundaries of the site were expanded to include additional source areas, and the site was renamed as the North Industrial Corridor (NIC). The deletion of the site from the NPL was proposed (61 Fed. Reg. 3365), and the comment period closed on March 1, 1996. The site was delisted from the NPL by Federal Notice dated April 29, 1996, (61 Fed. Reg. 18684) with an effective delisting date of April 29, 1996.

The 29th and Mead ground water area-wide site is in the investigation phase and area-wide cleanup activities have not been initiated. The city has procured a contractor to complete the RI/FS for the expanded site area, and the RI/FS work plan was approved by KDHE on November 11, 1997. Several facilities within the 29th and Mead site have had releases to the ground water.

A Record of Decision (ROD) for the Coleman OU portion of the 29th and Mead site was signed by EPA in 1992 which called for an interim action to augment the existing ground water pump and treat system and a final action to expand an existing SVE system to address the soil contamination. These actions address only the Coleman OU portion of the 29th and Mead site. The EPA negotiated a judicial Consent Decree with the PRPs, which include the Coleman

Company, Inc., Evcon Inc., and Recreational Vehicle Products, Inc. The Consent Decree was entered in the federal district court for the district of Kansas in February of 1994. The EPA is the lead agency for the Coleman OU.

3.5 Contaminants

Soil samples were collected from seven active or inactive degreaser pits and from the north and south fields of the Coleman OU property to evaluate potential source areas at the Coleman OU. Results indicate that TCE was detected in 23 soil borings from eight source areas. Concentrations of TCE in the soil ranged from not detected (ND) to 13,000 micrograms per kilogram (ug/kg) or parts per billion (ppb). Other significant VOC constituents detected during the soil sampling program and their respective concentration range includes: 1,1,1 TCA - ND to 6,100 ug/kg; tetrachloroethene (PCE) - ND to 41 ug/kg; cis - 1,2-dichloroethene (1,2 DCE) - ND to 520 ug/kg; 1,1 dichloroethene (1,1 DCE) - ND to 370 ug/kg and toluene -ND to 140,000 ug/kg. These data suggest that former degreaser pits 1, 2, 3, 4, 6, 7, and 8 and the south field are likely sources for TCE contamination. In addition, significant concentrations of TCA were observed in former degreaser pits 1, 2, and 4.

Ground water samples at the Coleman OU have been collected during several sampling events. In May 1990, a total of 68 monitoring wells were sampled for VOCs. As part of the RI, 35 monitoring wells were resampled to verify previous results. Analytical results indicate that TCE is the predominant VOC detected at the Coleman OU. TCE was detected in 32 of 35 monitoring wells sampled during the July 1991 sampling event. Concentrations of TCE ranged from ND to 15,000 micrograms per liter (ug/l). Other significant VOCs detected during the ground water sampling program and their respective concentration ranges include: TCA - ND to 3,500 ug/l; PCE - ND to 100 ug/l; 1,2 DCE - ND to 2,500 ug/l; 1,1 DCE - ND to 1,110 ug/l; and vinyl chloride - ND to 250 ug/l.

4.0 REMEDIAL ACTIONS

4.1 Remedy Selection

The selected remedy is a combination of the previously existing ground water system with an additional recovery well and expanded SVE system. Under this remedy, the existing ground water and soil system, which consists of two industrial wells, one recovery well, two air strippers, and the 62-point SVE system installed in 1988, has continued to operate. The ROD required an expansion of the existing SVE system for removal of VOCs from unsaturated soils in all known onsite source areas. In addition, the ROD required the installation of a recovery well along the southern boundary to enhance hydraulic control.

4.1.1 Soil Remedy

The selected remedy is the final remedy with respect to the soil at the Coleman OU. The soil remediation system installed in 1988, which consists of a 62-point SVE system, was incorporated into the final soil remedy. The SVE system was expanded for removal of VOCs from unsaturated soils in all known onsite source areas. Estimates indicate that this alternative

would remove VOCs from over 4,000,000 cubic feet of contaminated soil. The ROD required the construction of a SVE system consisting of 96 SVE points to be screened from approximately five to twenty feet below ground surface. Based upon the SVE pilot study, approximately eight blowers were needed to implement this alternative. Air monitoring is required to ensure the health and safety of onsite personnel and to ensure that vapors released from the SVE system do not pose a threat to human health or the environment.

4.1.2 Ground Water Remedy

The selected remedy represents an interim remedy with respect to the ground water at the Coleman OU. Because the plume of contaminated ground water at the Coleman OU has merged with the contaminated ground water from other sources in the 29th and Mead site, the final remedy for the 29th and Mead site will include the ground water remedy at the Coleman OU. The existing ground water system in place at the time of the remedy selection for the OU was incorporated into the remedy. This system consists of two industrial wells, one recovery well, and two air strippers which continue to operate. An additional recovery well was located along the southern boundary to enhance hydraulic control. The additional recovery well was installed in the same manner as the existing recovery wells and operates at approximately 200 gpm. Water is pumped to an existing onsite air stripper. Treated water is monitored through an NPDES permit prior to discharge. The estimated operating life of this alternative is 18 years. The enhanced pumping system at the southern boundary, in conjunction with the existing pumping system, was designed to help prevent offsite migration of VOCs over the long term through hydraulic control. In addition, the overall load of VOCs leaching into the ground water from active source areas has been greatly reduced by the SVE system.

The selected remedy described in the ROD for the Coleman OU was designed to address the principal threat posed by the contaminants in the ground water by preventing the further migration of contaminants off the OU onto the 29th and Mead site and by eventually restoring the ground water to acceptable quality (Safe Drinking Water Act MCLs) by the extraction and treatment of contaminated ground water. The remedy has further reduced the threat of continued contamination of the ground water from the soil source areas with the expansion of the SVE system.

4.2 Remedy Implementation

A Consent Order between EPA and Evcon Industries Inc., New Coleman Holdings Inc., and Recreational Vehicle Products Inc. for the Remedial Design/Remedial Action (RD/RA) was executed on February 17, 1993. A RD was developed for both the soil and ground water remedies. The final RD for the interim ground water remedy is dated May 3, 1996, and the final design for the soil remedy is dated August 5, 1999.

4.2.1 Soil Vapor Extraction System

Construction of the SVE system was initiated on March 9, 2000, and completed on May 3, 2000. The locations of the SVE system are presented in Figures 3 through 7. The system was started on May 15, 2000, and operation is ongoing with performance presented in Table 1.

4.2.2 Ground Water Remedial System

The installation of the ground water recovery well RW-2 was completed on October 14, 1996 (Figure 8). The well is six inches in diameter, and the screened interval of the well extends from 21 to 41 feet below ground surface. The recovery well was developed using a surge block, bailing, and over pumping. Installation of the recovery well pump, vault, flowmeter, and well head plumbing was completed on October 30, 1996. Ground water transfer line piping was installed and pressure tested. The existing air stripper blower was modified by changing blower sheaves and belts and installing a larger nozzle. Discharge piping from the air stripper to the effluent discharge was changed to accommodate the increased flow rate.

The system startup was in April 1997. RW-2 operates at a pumping rate of approximately 90 gpm, and the effluent is pumped to air stripper AS-2 at the A&E building. The treated effluent water gravity flows to the Wichita Drainage Canal under an NPDES permit. The ground water recovery systems are designed to run continuously unless shutdown by a pump control interlock condition generated by a pressure switch or a power failure.

4.3 Systems Operations/Operation and Maintenance

4.3.1 Soil Vapor Extraction System

An operations and maintenance (O&M) plan for the SVE system was prepared by Fluor Daniel Ground Water Technology, Inc. (GTI). The O&M manual includes a description of tasks for operation, maintenance, prescribed treatment, or operation conditions, and a schedule for each O&M task. A description of corrective action to be implemented in the event that cleanup or performance is exceeded was included in the O&M plan. Monitoring activities will involve data collection to evaluate VOC effluent concentration and remedial progress. VOC effluent concentration data were collected at system startup and were collected weekly for one month and quarterly thereafter. System balancing and adjustments will be ongoing as conditions change during monitoring inspections.

Performance monitoring activities involve data collection to evaluate VOC effluent concentrations and removal of VOCs from the soil by collecting air samples from the SVE exhaust. Air emissions and air flow data are collected and reported to EPA in the Quarterly Update Reports of RD/RA Activities. A total of 4,185 pounds of VOCs have been removed from contaminated soils by the SVE system from May 17, 2000, through October 4, 2004. The SVE system performance is provided in Table 1.

4.3.2 Ground Water Remedial System

An O&M manual for the interim ground water remedy was prepared by Fluor Daniel GTI. Under normal operating conditions, the system operating tasks are limited to equipment maintenance and monitoring tasks. Facility personnel confirm systems operation on a daily basis.

A ground water compliance program was developed and is described in the RD/RA Ground Water Monitoring Plan dated May 3, 1996. The purpose of the ground water monitoring compliance program is to confirm hydraulic control of the ground water contaminant plume at the Coleman OU. The compliance monitoring program consists of two procedures for confirming hydraulic control of the ground water contaminant plume. The first procedure is the evaluation of water elevation data on and near the Coleman OU to verify the direction of ground water flow and the extent of hydraulic control exerted by the operating recovery wells. The second procedure consists of the collection of ground water quality data from a specified point of compliance wells and statistical assessment of the ground water quality data to evaluate the effectiveness of the hydraulic control systems.

Ground water monitoring is conducted on a semiannual basis utilizing 46 ground water wells (Figure 8). Ground water elevations are measured for all wells, and samples from selected monitoring wells are analyzed for chlorinated VOCs and toluene. The ground water elevation data are compiled and flowlines are generated to show the direction of ground water flow and the influence of the ground water remediation system (Figure 9). The shallow and deep concentrations of TCE are shown in Figures 10 and 11.

Air emissions are monitored from the air stripper towers twice yearly during ground water sampling events, and the air samples are analyzed for VOCs. Influent and effluent water samples from the air stripper towers are collected and analyzed for VOCs to determine the removal efficiency of VOCs from the ground water. Ground water effluent samples are collected on a monthly basis from both air stripper towers for VOCs as required in the monitoring requirements specified in the NPDES permit. Data contained in the Quarterly Update Report of RD/RA Activities dated January 17, 2005, demonstrated that the ground water treatment systems are operating at 100 percent efficiency for the removal of VOCs from the influent (Tables 2a and 2b).

The PRP submitted annual ground water monitoring reports to EPA to document hydraulic control of the ground water at the Coleman OU. The most recent annual ground water compliance monitoring report is dated April 5, 2001. This report contains water elevation data to verify direction of ground water flow and the extent of hydraulic control by the operating recovery wells. This report also contained a statistical assessment of ground water data. The evaluation of the annual ground water data in that report demonstrated that:

-Hydraulic control continues to be achieved at the Coleman OU. RW-2 continues to enhance the ground water containment at the Coleman OU.

- The formal trend statistical analysis performed on the analytical data for the point of compliance wells indicate statistically significant downward trends for all but three monitoring wells.
- Time-series graphs of the point of compliance monitoring well concentration data show that monitoring wells with statistically significant downward trends also show declining concentrations for total VOCs. The declining concentrations are approaching asymptotic trends (Figure 12).
- Time-series graphs of the two recovery wells show decreasing ground water concentrations (Figures 13 and 14).
- The ground water treatment systems are operating at 100 percent efficiency for the contaminants of concern.

Since 2001, semi-annual ground water monitoring has been conducted and the ground water remedial system evaluated. The results of the semiannual ground water monitoring are reported to EPA in the Quarterly Update Reports of RD/RA Activities. The most recent ground water monitoring used for this review was conducted in November 2004. The results of that ground water monitoring event reported that the ground water treatment system continues to maintain hydraulic control at the Coleman OU (Figure 9).

The Point of Compliance monitoring wells are sampled to confirm the effectiveness of the ground water remedial system. These wells are as follows:

MW-71D/MW-71S, formerly MW-1/MW-4
MW-3/MW-47
MW-67/MW-68
MW-51/MW-52
MW-59/MW-60
MW-15/MW-45
MW-61 /MW-62

The ground water TCE data from these wells are presented in Table 3, which generally demonstrates a decreasing trend in TCE concentrations since May 1990.

A review of the available data was completed by the EPA Ground Water Technical Support Center in Ada, Oklahoma (Attachment 2). The review agrees that the contaminant plume has been contained across the majority of the site area, but appears that the current system is not containing the plume along part of the western boundary. Details of those areas are discussed in the report in Attachment 2.

5.0 PROGRESS SINCE THE LAST REVIEW

This is the first five-year review for the Coleman OU of the 29th and Mead site.

6.0 FIVE-YEAR REVIEW PROCESS

6.1 Administrative Components

The five-year review for the Coleman OU of the 29th and Mead site was conducted by Ken Rapplean of EPA, Remedial Project Manager (RPM) for the site, and William Bunn of EPA. Randy Carlson of KDHE assisted in the review as the representative for the support agency.

The EPA completed the following tasks during the five-year review for the Coleman OU of the 29th and Mead site:

- Reviewed site documents such as the RI Report, the Focused FS Report, the ROD, the Consent Agreement, the Baseline Risk Assessment Report, annual ground water monitoring reports, and quarterly monitoring reports (Attachment 1)
- Reviewed applicable or relevant and appropriate requirements (ARARs)
- Conducted a site inspection and interviews of appropriate persons
- Developed recommendations for the site
- Prepared a report

6.2 Community Involvement

Community involvement activities included placement of a notice of the five-year review in the Wichita Eagle Newspaper. When the five-year review report is finalized, a copy of the document will be made available at the KDHE District Office in Wichita, Kansas. The EPA will place a notice of the availability of the document in the Wichita Eagle Newspaper.

Members of the local community and KDHE were notified of the initiation of the five-year review process through the mailing of a Fact Sheet on August 26, 2004, and the placement of a display advertisement in the Wichita Eagle Newspaper on August 29, 2004.

6.3 Document Review

The following standards were identified as ARARs in the ROD:

- Safe Drinking Water Act
- Clean Water Act

The Safe Drinking Water Act was reviewed for changes that could affect the protectiveness of the remedy. Newly promulgated Safe Drinking Water Act standards were not discovered during the five-year review. The MCLs for the contaminants of concern have not become more stringent since the signing of the ROD in 1994.

Compliance with the Clean Water Act requirements under 40 C.F.R. 122-125 for point source direct discharge has been obtained under the NPDES by which effluent standards, monitoring requirements, and standard conditions for discharge are set. A NPDES permit has been granted to both operating air stripper units on the Coleman OU site for the discharge of treated water. This discharge is in compliance with the terms of the permit. Newly promulgated Clean Water Act standards were not discovered during the five-year review which would affect the permit or the discharge requirements.

One new ARAR was identified during the five-year review. In 1999, KDHE developed risk-based standards for soil and ground water for sites being addressed by KDHE programs. The 1999 standards were revised and are presented in a document titled, Risk-Based Standards for Kansas, (RSK Manual-3rd Version), dated March 1, 2003. The risk-based standards have not been promulgated by the state of Kansas and therefore fall in the category of To Be Considered. The KDHE developed risk-based standards for exposure to soil and ground water media under residential and non-residential scenarios. Standards include pathways for exposure to soil, exposure to ground water, and migration of contaminants from soil to ground water. The risk-based standards for the contaminants detected in ground water at the site are not more stringent than the MCLs.

6.4 Data Review

6.4.1 Soil Vapor Extraction System

The PRP submits a Quarterly Update Report of RD/RA Activities to EPA to report activities related to O&M of the ground water remedial system and the SVE system. These reports include performance data of the SVE system summarizing sampling activities and VOCs removed by the system.

Performance monitoring activities involve data collection to evaluate VOC effluent concentrations and removal of VOCs from the soil by collecting air samples from the SVE exhaust. The most recent air emissions and air flow data were collected in October 2004 and reported to EPA. Total VOCs removed by the SVE system ranged from 104 pounds for sump 9 to 2,165 pounds for the south field. The SVE system performance is provided in Table 1. A total of 4,185 pounds of VOCs have been removed from contaminated soils by the SVE system from May 17, 2000, through October 4, 2004. None of the SVE systems had vapor recovery equipment. The SVE systems were required to release less than 40 tons of VOCs per year, and the release was below this limit.

Data presented in the quarterly report dated January 17, 2005, demonstrated that VOC concentrations and removal rates at all of the areas being addressed are exhibiting an asymptotic trend. The stabilization of VOC removal rates at relatively low concentrations is an indicator that the SVE system may have attained conditions for closure. The SVE systems at sums 1, 2, and 3 were shut down in July 2004 and re-started and sampled in October 2004. The effluent

sampling results for the SVE systems at sums 1, 2, and 3 indicate little to no rebound in VOC emissions. The SVE systems at sums 4, 5, 6, 7, 8, 9 and the south field were shut down in October 2004. These systems were re-started and sampled in January 2005, and the results were not available for the five-year review.

According to the EPA, Office for Research and Development's (ORD) evaluation of the SVE systems, they are operating according to design parameters and monitored adequately. The SVE systems have been shut down periodically, and a rebound was observed at each system. The PRPs for the Coleman OU may approach EPA to perform soil sampling to evaluate the effectiveness of the SVE systems regarding removal of contaminant mass from soil. The soil cleanup goals are listed in Tables 18 and 19 of the "Pre-final Remedial Design and Remedial Action Work Plan Final Soil Remedy" dated August 5, 1999, by IT Corporation (Volume I & II). These cleanup goals are the result of elaborate SESOIL modeling and soil characterization. The values from these tables are listed as milligrams per kilogram (mg/kg) and are in magnitude of 10^5 mg/kg for various contaminants.

6.4.2 Ground Water Remedial System

The results of the semiannual ground water monitoring are reported to EPA in the Quarterly Update Reports of RD/RA Activities. The ground water monitoring included in the five-year review was conducted in November 2004. The results of that ground water monitoring report stated that the ground water treatment system continues to maintain hydraulic control at the Coleman OU (Figure 4).

The review by the EPA Ground Water Technical Support Center agreed that the contaminant plume has been contained across most of the site area. Their report states that the contaminant plume along areas of the western boundary is not being contained. Their report (Attachment 2) recommends some modifications to the system which includes consideration of adding or converting a monitoring well (MW-70) into an extraction well and to modify the pumping operation such as pulsed pumping and/or with a higher pumping rate to mobilize the contaminated waters located in the stagnation zones.

6.5 Site Inspection

The EPA and KDHE staff conducted a site inspection at the Coleman OU of the 29th and Mead site on September 23, 2004. The results of the site inspection are discussed below.

The site inspection was conducted by Kenneth Rapplean and William Bunn of EPA and Randall Carlson of KDHE. Assisting in the site inspection were representatives of EPA, ORD. Ms. Michelle Simon of EPA/ORD/National Risk Management Research Laboratory (NRMRL) is providing technical assistance for the SVE system to EPA, Region 7, for the five-year process. She reviewed the SVE system operation and performance during the site inspection. Mr. David Burden of EPA/ORD/NRMRL is providing technical assistance for the ground water remedial system to EPA, Region 7, for the five-year process. He reviewed the ground water remedial system operation and performance during the site inspection.

The purpose of the site inspection was to assess the operation of the SVE system and the ground water extraction system. A meeting was conducted with representatives of EPA, KDHE, York, and Shaw Environmental, Inc., prior to inspection of the ground water remedial system and the SVE system. The O&M of the systems was discussed and related documents were reviewed. Documents reviewed included the O&M manual, the NPDES permit, and compliance data.

The manufacturing operations manager for the York facility and representatives of Shaw conducted the tour of the ground water remedial and SVE systems. The ground water remedial wells and the air stripper were operational at the time of the site inspection. The SVE systems at each of the sumps and the south field were inspected. The hardware for each of the SVE systems was installed and in good condition. The SVE systems at sumps 1, 2, and 3 were shut down in July 2004 and not operating at the time of the inspection. These sumps were re-started and sampled in October 2004 to evaluate rebound effects.

6.6 Interviews

Interviews were not conducted with the general public during the five-year review. The EPA has not received any complaints or concerns from the public or businesses adjacent to the 29th and Mead site.

Interviews were conducted during the site inspection with representatives of KDHE, York, and Shaw Environmental, Inc. Shaw is responsible for the O&M of the SVE and ground water remediation systems. Discussions with Shaw representatives were conducted during the site inspection regarding the O&M of the systems. The effect of the systems on manufacturing operations was discussed with Mr. Fred Wise, Director of Manufacturing Operations for the York UPG Wichita plant. State acceptance of the systems O&M was discussed with Dr. Randall Carlson of KDHE.

7.0 ASSESSMENT

The following conclusions support the finding that the remedy at the Coleman OU of the 29th and Mead site is protective of human health and the environment.

Question A: Is the remedy functioning as intended by the decision document?

Remedial Action Performance: The RA continues to operate and function as designed and intended by the ROD. This includes both the SVE system for remediation of contaminated soil and the ground water remedial system for containment of contaminated ground water. The SVE system has removed approximately 4,208 pounds of VOC contaminants from soil since May 2000. Data presented in the quarterly report dated January 17, 2005, demonstrate that VOC concentrations and removal rates at all of the areas being addressed by the SVE systems are exhibiting an asymptotic trend. The stabilization of VOC removal rates at relatively low concentrations is an indicator that the SVE system may have removed the majority of the VOCs

which can be addressed by the system. The ground water remedial system continues to maintain hydraulic control of most of the ground water at the site, but there is a concern that some is escaping from the western side of the site area.

System Operations/Operations & Maintenance: Monitoring and site maintenance have been performed in accordance with the O&M work plan. The ground water remedial wells and the air stripper are operational. The hardware for each of the SVE systems is in operational condition.

The SVE systems at sums 1, 2, and 3 were shut down in July 2004 and not operating at the time of the inspection. These sums were re-started and sampled in October 2004 to evaluate rebound effects. The EPA has not evaluated the costs of O&M activities expended by the PRPs.

Opportunities for Optimization: The PRPs are evaluating the SVE system to determine if operation of parts of the system should be discontinued. VOC concentrations and removal rates at all of the areas being addressed by the SVE systems are exhibiting an asymptotic trend. The PRPs may approach EPA to perform soil sampling to evaluate the effectiveness of the SVE systems regarding removal of contaminant mass from soil. This information in addition to the asymptotic trend may result in a request to discontinue operation of the SVE systems. Review by the PRP, the ORD, EPA regional staff, and the state will be implemented to address the concerns that containment along the west side of the site is not being maintained and to consider adjustments to the system.

Early Indicators of Potential Issues: No issues or problems have been identified which could place protectiveness at risk. The EPA is not aware of any use of the ground water at the site for potable purposes. Equipment or changes have not been an issue during implementation and operation of the RA. The EPA has determined that additional study and review of the effectiveness of the pump and treat operation along the western border of the site needs to be considered.

Implementation of Institutional Controls: Institutional controls were not part of the RA. Institutional controls at the OU site area can be considered to be in place because there is no use of the ground water for potable purposes, only industrial. All drinking water is supplied by the city of Wichita. All owners and operators at the site are respondents to the Consent Decree or successor owners/operators and are aware of the contaminants at the site.

Question B: Are the assumptions used at the time of the remedy selection still valid?

Changes in Standards and To Be Considereds: The MCLs for the contaminants of concern have not changed during the last five years. The five-year review identified state risk-based standards that have been developed during the last five years. Kansas has not promulgated its risk-based standards; therefore, these new standards fall under the category of To Be Considered. The standards developed by Kansas for site contaminants in ground water are not more stringent than existing federal standards.

Changes in Exposure Pathways: Land use in the area of the site has not changed during the last five years, and no future plans to change the land use have been identified. No new/different contaminants or sources have been identified at the site during the five-year review. The baseline risk assessment focused on potential or actual risks to human health posed by contaminants at or released from the Coleman OU property. The human population most likely to be exposed to contaminated ground water and air are those individuals living and working in the vicinity. The exposure assumptions and pathways used to develop the Human Health Risk Assessment are still valid. A review by an EPA regional risk assessor and toxicologist included a comparison of the toxicity values used in the original risk assessment, completed in 1991 to present and the impact on risk estimates if the current reference doses were used. The compounds where the reference dose value changed had the hazard quotient recalculated and compared to the original risk assessment. The impact was considered to be insignificant in all cases because no recalculated hazard quotients exceed 1.0.

Changes in Toxicity and Other Contaminant Characteristics: The review indicated no significant impacts.

Changes in Risk Assessment Methodologies: Changes in risk assessment methodologies since the time of the ROD do not call into question the protectiveness of the remedy.

Expected Progress Towards Meeting Remedial Action Objectives: The remedy is progressing as expected. The SVE system may have removed the majority of the VOCs which can be addressed by the system. The ground water remedial system continues to remove contaminants from the ground water, but may need to be adjusted to insure containment, particularly on the west side of the site area.

Question C: Has any other information come to light that could call into question the protectiveness of the remedy?

No ecological targets were identified during the baseline risk assessment and none were identified during the five-year review and therefore, monitoring of ecological targets is not necessary. No weather-related events have affected the protectiveness of the remedy. There is no other information that calls into question the protectiveness of the remedy.

Technical Assessment Summary

According to the data reviewed, the site inspection, and the interviews, the remedy is functioning as intended by the ROD. There have been no changes in the physical conditions of the site that would affect the protectiveness of the remedy. The stabilization of VOC removal rates at relatively low concentrations is an indicator that the SVE system may have removed the majority of the VOCs which can be addressed by the system. The ground water remedial system continues to maintain hydraulic control of ground water across most of the site and may need to be adjusted on the western edge. There have been no changes of significance in the toxicity factors for the contaminants of concern that were used in the baseline risk assessment, and there

has been no change to the standardized risk assessment methodology that could affect the protectiveness of the remedy. There is no other information that calls into question the protectiveness of the remedy.

8.0 ISSUES

As discussed, the PRPs are evaluating the SVE systems to determine when they may consider discontinuing the operations at each of the locations. The PRPs, EPA, and the state need to review the ground water extraction system to determine if changes need to be made on the onsite system and determine the impact on the immediate area surrounding the site, which is part of the NIC site.

9.0 RECOMMENDATIONS AND FOLLOW-UP ACTIONS

Continue to collect quarterly SVE systems performance data to evaluate system operation. The PRPs are evaluating the SVE system to determine if operation of parts of the system should be discontinued. The VOC concentrations and removal rates at all of the areas being addressed by the SVE systems are exhibiting an asymptotic trend. The PRPs may approach EPA to perform soil sampling to evaluate the effectiveness of the SVE systems regarding removal of contaminant mass from soil. This information in addition to the asymptotic trend may result in a request to discontinue operation of the SVE systems.

Continue the ground water monitoring compliance program to confirm hydraulic control of the ground water contaminant plume at the Coleman OU, particularly after the review of the system is complete and any adjustments to the system are made. The compliance monitoring program should continue to consist of the two procedures in place for confirming hydraulic control of the ground water contaminant plume currently utilized. The first procedure is an evaluation of water elevation data on and near the Coleman OU to verify the direction of ground water flow and the extent of hydraulic control exerted by the operating recovery wells. The second procedure consists of the collection of ground water quality data from a specified point of compliance wells to evaluate the effectiveness of the contamination removal. Air stripper performance data should continue to be collected to evaluate percent removal for each treatment system and the air emission rates of each treatment system.

10.0 PROTECTIVENESS STATEMENT

The remedy at the Coleman OU of the 29th and Mead Superfund site is protective of human health and the environment through removal of soil VOC contamination by the SVE system and hydraulic containment of ground water contamination by the ground water remedial system.

Long-term protectiveness of the RA will continue to be verified by obtaining additional ground water sampling to verify hydraulic containment by the ground water remediation system in addition to the removal of contamination of the soil.

11.0 NEXT REVIEW

This is a statutory site that requires ongoing five-year reviews. The next review will be conducted ten years from the date of the initiation of the onsite construction (March 9, 2010).

12.0 OTHER COMMENTS

No other comments are necessary.

Tables

Table 2a
System Evaluation for North Treatment System

Coleman Operable Unit
Wichita, Kansas

GROUNDWATER RECOVERY SYSTEM EFFICIENCY					MASS REMOVED				AIR EMISSIONS			
CONSTITUENT	DATE	RW-1 (ug/l)	AS-1-EFF (ug/l)	% EFF	Concentration (ug/l)	Flow Rate gal/min	Flow Rate l/min	Mass Removal Rate (ug/min)	Air Flow Rate (cfm)	Air-Emissions Rate (g/m3)	Monthly Air Emissions (g)	Monthly Air Emissions (lbs)
TCE	05/24/00	23.5	<0.5	100	23.5	0.47	1.76148	41.39478	8000	0.0000002	1.13	0.00
PCE	05/24/00	1	<0.5	100	1	0.47	1.7766	1.7766	8000	0.0000000	0.05	0.00
111TCA	05/24/00	<0.5	<0.5	NC	0	0.47	1.7766	0	8000	0.0000000	0.00	0.00
11DCE	05/24/00	4.7	<0.5	100	4.7	0.47	1.7766	8.35002	8000	0.0000000	0.23	0.00
Vinyl Chloride	05/24/00	124	<0.5	100	124	0.47	1.7766	220.2984	8000	0.0000010	6.03	0.01
Toluene	05/24/00	<0.5	<0.5	NC	0	0.47	1.7766	0	8000	0.0000000	0.00	0.00
cis12DCE	05/24/00	<0.5	<0.5	NC	0	0.47	1.7766	0	8000	0.0000000	0.00	0.00
TCE	06/12/00	205	<0.5	100	205	199.00	752.22	154205.1	8000	0.0006807	7994.10	17.63
PCE	06/12/00	1.6	<0.5	100	1.6	199.00	752.22	1203.552	8000	0.0000053	62.39	0.14
111TCA	06/12/00	3.4	<0.5	100	3.4	199.00	752.22	2557.548	8000	0.0000113	132.59	0.29
11DCE	06/12/00	3.8	<0.5	100	3.8	199.00	752.22	2858.436	8000	0.0000126	148.18	0.33
Vinyl Chloride	06/12/00	<0.5	<0.5	NC	0	199.00	752.22	0	8000	0.0000000	0.00	0.00
Toluene	06/12/00	<0.5	<0.5	NC	0	199.00	752.22	0	8000	0.0000000	0.00	0.00
cis12DCE	06/12/00	27.8	<0.5	100	27.8	199.00	752.22	20911.716	8000	0.0000923	1084.08	2.39
TCE	07/18/00	154	<0.5	100	154	204.00	771.12	118752.48	8000	0.0005242	5985.21	13.20
PCE	07/18/00	<0.5	<0.5	NC	0	204.00	771.12	0	8000	0.0000000	0.00	0.00
111TCA	07/18/00	33.1	<0.5	100	33.1	204.00	771.12	25524.072	8000	0.0001127	1286.43	2.84
11DCE	07/18/00	5.7	<0.5	100	5.7	204.00	771.12	4395.384	8000	0.0000194	221.53	0.49
Vinyl Chloride	07/18/00	<0.5	<0.5	NC	0	204.00	771.12	0	8000	0.0000000	0.00	0.00
Toluene	07/18/00	<0.5	<0.5	NC	0	204.00	771.12	0	8000	0.0000000	0.00	0.00
cis12DCE	07/18/00	5.2	<0.5	100	5.2	204.00	771.12	4009.824	8000	0.0000177	202.10	0.45
TCE	08/22/00	124	<0.5	100	124	207.00	782.46	97025.04	8000	0.0004283	3912.10	8.63
PCE	08/22/00	0.9	<0.5	100	0.9	207.00	782.46	704.214	8000	0.0000031	28.39	0.06
111TCA	08/22/00	22	<0.5	100	22	207.00	782.46	17214.12	8000	0.0000760	694.08	1.53
11DCE	08/22/00	5.2	<0.5	100	5.2	207.00	782.46	4068.792	8000	0.0000180	164.06	0.36
Vinyl Chloride	08/22/00	<0.5	<0.5	NC	0	207.00	782.46	0	8000	0.0000000	0.00	0.00
Toluene	08/22/00	<0.5	<0.5	NC	0	207.00	782.46	0	8000	0.0000000	0.00	0.00
cis12DCE	08/22/00	4.2	<0.5	100	4.2	207.00	782.46	3286.332	8000	0.0000145	132.51	0.29

Table 2a
System Evaluation for North Treatment System

Coleman Operable Unit
Wichita, Kansas

GROUNDWATER RECOVERY SYSTEM EFFICIENCY					MASS REMOVED				AIR EMISSIONS			
CONSTITUENT	DATE	RW-1 (ug/l)	AS-1-EFF (ug/l)	% EFF	Concentration (ug/l)	Flow Rate gal/min	Flow Rate l/min	Mass Removal Rate (ug/min)	Air Flow Rate (cfm)	Air Emissions Rate (g/m3)	Monthly Air Emissions (g)	Monthly Air Emissions (lbs)
TCE	09/19/00	124	<0.5	100	124	202.00	763.56	94681.44	8000	0.0004180	3272.23	7.22
PCE	09/19/00	0.9	<0.5	100	0.9	202.00	763.56	687.204	8000	0.0000030	23.75	0.05
111TCA	09/19/00	21.8	<0.5	100	21.8	202.00	763.56	16645.608	8000	0.0000735	575.28	1.27
11DCE	09/19/00	5.1	<0.5	100	5.1	202.00	763.56	3894.156	8000	0.0000172	134.58	0.30
Vinyl Chloride	09/19/00	<0.5	<0.5	NC	0	202.00	763.56	0	8000	0.0000000	0.00	0.00
Toluene	09/19/00	<0.5	<0.5	NC	0	202.00	763.56	0	8000	0.0000000	0.00	0.00
cis12DCE	09/19/00	4.4	<0.5	100	4.4	202.00	763.56	3359.664	8000	0.0000148	116.11	0.26
TCE	10/13/00	136	<0.5	100	136	206.00	778.68	105900.48	8000	0.0004675	5032.46	11.10
PCE	10/13/00	<0.5	<0.5	NC	0	206.00	778.68	0	8000	0.0000000	0.00	0.00
111TCA	10/13/00	21.8	<0.5	100	21.8	206.00	778.68	16975.224	8000	0.0000749	806.67	1.78
11DCE	10/13/00	4.1	<0.5	100	4.1	206.00	778.68	3192.588	8000	0.0000141	151.71	0.33
Vinyl Chloride	10/13/00	<0.5	<0.5	NC	0	206.00	778.68	0	8000	0.0000000	0.00	0.00
Toluene	10/13/00	<0.5	<0.5	NC	0	206.00	778.68	0	8000	0.0000000	0.00	0.00
cis12DCE	10/13/00	4.3	<0.5	100	4.3	206.00	778.68	3348.324	8000	0.0000148	159.11	0.35
TCE	11/15/00	153	<0.5	100	153	207.00	782.46	119716.38	8000	0.0005285	12067.57	26.61
PCE	11/15/00	0.8	<0.5	100	0.8	207.00	782.46	625.968	8000	0.0000028	63.10	0.14
111TCA	11/15/00	27	<0.5	100	27	207.00	782.46	21126.42	8000	0.0000933	2129.57	4.70
11DCE	11/15/00	6.7	<0.5	100	6.7	207.00	782.46	5242.482	8000	0.0000231	528.45	1.17
Vinyl Chloride	11/15/00	<0.5	<0.5	NC	0	207.00	782.46	0	8000	0.0000000	0.00	0.00
Toluene	11/15/00	<0.5	<0.5	NC	0	207.00	782.46	0	8000	0.0000000	0.00	0.00
cis12DCE	11/15/00	6.7	<0.5	100	6.7	207.00	782.46	5242.482	8000	0.0000231	528.45	1.17
TCE	1/24/2001	77.7	<0.5	100	77.7	200.00	756	58741.2	8000	0.000259302	2453.07	5.41
PCE	1/24/2001	0.8	<0.5	100	0.8	200.00	756	604.8	8000	2.66977E-06	25.26	0.06
TCA111	1/24/2001	18.9	<0.5	100	18.9	200.00	756	14288.4	8000	6.30734E-05	596.69	1.32
1,1-DCE	1/24/2001	4.5	<0.5	100	4.5	200.00	756	3402	8000	1.50175E-05	142.07	0.31
Vinyl chloride	1/24/2001	<0.5	<0.5	NC	0	200.00	756	0	8000	0	0.00	0.00
cis-1,2-DCE	1/24/2001	3.5	<0.5	100	3.5	200.00	756	2646	8000	1.16803E-05	110.50	0.24

Table 2a
System Evaluation for North Treatment System

Coleman Operable Unit
Wichita, Kansas

GROUNDWATER RECOVERY SYSTEM EFFICIENCY					MASS REMOVED				AIR EMISSIONS			
CONSTITUENT	DATE	RW-1 (ug/l)	AS-1-EFF (ug/l)	% EFF	Concentration (ug/l)	Flow Rate gal/min	Flow Rate l/min	Mass Removal Rate (ug/min)	Air Flow Rate (cfm)	Air Emissions Rate (g/m3)	Monthly Air Emissions (g)	Monthly Air Emissions (lbs)
TCE	2/22/2001	3.2	<0.5	100	3.2	200.00	756	2419.2	8000	1.06791E-05	66.19	0.15
PCE	2/22/2001	<0.5	<0.5	NC	0	200.00	756	0	8000	0	0.00	0.00
TCA111	2/22/2001	11	<0.5	100	11	200.00	756	8316	8000	3.67094E-05	227.53	0.50
1,1-DCE	2/22/2001	2.3	<0.5	100	2.3	200.00	756	1738.8	8000	7.6756E-06	47.57	0.10
Vinyl chloride	2/22/2001	<0.5	<0.5	NC	0	200.00	756	0	8000	0	0.00	0.00
cis-1,2-DCE	2/22/2001	<0.5	<0.5	NC	0	200.00	756	0	8000	0	0.00	0.00
TCE	3/13/2001	74	<0.5	100	74	200.00	756	55944	8000	0.000246954	2900.18	6.39
PCE	3/13/2001	0.9	<0.5	100	0.9	200.00	756	680.4	8000	3.0035E-06	35.27	0.08
TCA111	3/13/2001	23.1	<0.5	100	23.1	200.00	756	17463.6	8000	7.70897E-05	905.33	2.00
1,1-DCE	3/13/2001	5.2	<0.5	100	5.2	200.00	756	3931.2	8000	1.73535E-05	203.80	0.45
Vinyl chloride	3/13/2001	<0.5	<0.5	NC	0	200.00	756	0	8000	0	0.00	0.00
cis-1,2-DCE	3/13/2001	3.4	<0.5	100	3.4	200.00	756	2570.4	8000	1.13465E-05	133.25	0.29
TCE	4/18/2001	75.3	<0.5	100	75.3	200.00	756	56926.8	8000	0.000251293	1639.51	3.62
PCE	4/18/2001	0.9	<0.5	100	0.9	200.00	756	680.4	8000	3.0035E-06	19.60	0.04
TCA111	4/18/2001	18.2	<0.5	100	18.2	200.00	756	13759.2	8000	6.07374E-05	396.27	0.87
1,1-DCE	4/18/2001	5	<0.5	100	5	200.00	756	3780	8000	1.66861E-05	108.87	0.24
Vinyl chloride	4/18/2001	<0.5	<0.5	NC	0	200.00	756	0	8000	0	0.00	0.00
cis-1,2-DCE	4/18/2001	3.2	<0.5	100	3.2	200.00	756	2419.2	8000	1.06791E-05	69.67	0.15
TCE	5/8/2001	81	<0.5	100	81	200.00	756	61236	8000	0.000270315	2469.07	5.44
PCE	5/8/2001	0.8	<0.5	100	0.8	200.00	756	604.8	8000	2.66977E-06	24.39	0.05
TCA111	5/8/2001	16.3	<0.5	100	16.3	200.00	756	12322.8	8000	5.43967E-05	496.86	1.10
1,1-DCE	5/8/2001	4.7	<0.5	100	4.7	200.00	756	3553.2	8000	1.56849E-05	143.27	0.32
Vinyl chloride	5/8/2001	<0.5	<0.5	NC	0	200.00	756	0	8000	0	0.00	0.00
cis-1,2-DCE	5/8/2001	3.2	<0.5	100	3.2	200.00	756	2419.2	8000	1.06791E-05	97.54	0.22
TCE	6/5/2001	108	<0.5	100	108	200.00	756	81648	8000	0.00036042	6584.18	14.52
PCE	6/5/2001	<0.5	<0.5	NC	0	200.00	756	0	8000	0	0.00	0.00
TCA111	6/5/2001	22	<0.5	100	22	200.00	756	16632	8000	7.34188E-05	1341.22	2.96
1,1-DCE	6/5/2001	5.4	<0.5	100	5.4	200.00	756	4082.4	8000	1.8021E-05	329.21	0.73
Vinyl chloride	6/5/2001	<0.5	<0.5	NC	0	200.00	756	0	8000	0	0.00	0.00
cis-1,2-DCE	6/5/2001	4.1	<0.5	100	4.1	200.00	756	3099.6	8000	1.36826E-05	249.96	0.55

Table 2a
System Evaluation for North Treatment System

Coleman Operable Unit
Wichita, Kansas

GROUNDWATER RECOVERY SYSTEM EFFICIENCY					MASS REMOVED				AIR EMISSIONS			
CONSTITUENT	DATE	RW-1 (ug/l)	AS-1-EFF (ug/l)	% EFF	Concentration (ug/l)	Flow Rate gal/min	Flow Rate l/min	Mass Removal Rate (μ g/min)	Air Flow Rate (cfm)	Air Emissions Rate (g/m ³)	Monthly Air Emissions (g)	Monthly Air Emissions (lbs)
TCE	7/31/2001	150	<0.5	100	150	150.00	567	85050	8000	0.000375437	1837.10	4.05
PCE	7/31/2001	<0.5	<0.5	NC	0	150.00	567	0	8000	0	0.00	0.00
TCA111	7/31/2001	26.2	<0.5	100	26.2	150.00	567	14855.4	8000	6.55763E-05	320.88	0.71
1,1-DCE	7/31/2001	7.1	<0.5	100	7.1	150.00	567	4025.7	8000	1.77707E-05	86.96	0.19
Vinyl chloride	7/31/2001	<0.5	<0.5	NC	0	150.00	567	0	8000	0	0.00	0.00
cis-1,2-DCE	7/31/2001	5.1	<0.5	100	5.1	150.00	567	2891.7	8000	1.27649E-05	62.46	0.14
TCE	8/15/2001	152	<0.5	100	152	208.71	788.9238	119916.4176	8000	0.000529348	5871.19	12.95
PCE	8/15/2001	0.6	<0.5	100	0.6	208.71	788.9238	473.35428	8000	2.08953E-06	23.18	0.05
TCA111	8/15/2001	24.1	<0.5	100	24.1	208.71	788.9238	19013.06358	8000	8.39295E-05	930.89	2.05
1,1-DCE	8/15/2001	6.4	<0.5	100	6.4	208.71	788.9238	5049.11232	8000	2.22883E-05	247.21	0.55
Vinyl chloride	8/15/2001	<0.5	<0.5	NC	0	208.71	788.9238	0	8000	0	0.00	0.00
cis-1,2-DCE	8/15/2001	5.1	<0.5	100	5.1	208.71	788.9238	4023.51138	8000	1.7761E-05	196.99	0.43
TCE	9/18/2001	<0.5	<0.5	NC	0	200.00	756	0	8000	0	0.00	0.00
PCE	9/18/2001	0.7	<0.5	100	0.7	200.00	756	529.2	8000	2.33605E-06	22.86	0.05
TCA111	9/18/2001	15.3	<0.5	100	15.3	200.00	756	11566.8	8000	5.10594E-05	499.69	1.10
1,1-DCE	9/18/2001	4.4	<0.5	100	4.4	200.00	756	3326.4	8000	1.46838E-05	143.70	0.32
Vinyl chloride	9/18/2001	<0.5	<0.5	NC	0	200.00	756	0	8000	0	0.00	0.00
cis-1,2-DCE	9/18/2001	3.8	<0.5	100	3.8	200.00	756	2872.8	8000	1.26814E-05	124.11	0.27
TCE	10/18/2001	10.5	<0.5	100	10.5	158.22	598.0716	6279.7518	8000	2.77208E-05	298.42	0.66
PCE	10/18/2001	<0.5	<0.5	NC	0	158.22	598.0716	0	8000	0	0.00	0.00
TCA111	10/18/2001	5.9	<0.5	100	5.9	158.22	598.0716	3528.62244	8000	1.55764E-05	167.68	0.37
1,1-DCE	10/18/2001	1.7	<0.5	100	1.7	158.22	598.0716	1016.72172	8000	4.48812E-06	48.32	0.11
Vinyl chloride	10/18/2001	<0.5	<0.5	NC	0	158.22	598.0716	0	8000	0	0.00	0.00
cis-1,2-DCE	10/18/2001	<0.5	<0.5	NC	0	158.22	598.0716	0	8000	0	0.00	0.00
TCE	11/20/2001	139	<0.5	100	139	205.05	775.089	107737.371	8000	0.000475586	5585.18	12.32
PCE	11/20/2001	0.9	<0.5	100	0.9	205.05	775.089	697.5801	8000	3.07933E-06	36.16	0.08
TCA111	11/20/2001	20	<0.5	100	20	205.05	775.089	15501.78	8000	6.84297E-05	803.62	1.77
1,1-DCE	11/20/2001	6.2	<0.5	100	6.2	205.05	775.089	4805.5518	8000	2.12132E-05	249.12	0.55
Vinyl chloride	11/20/2001	<0.5	<0.5	NC	0	205.05	775.089	0	8000	0	0.00	0.00
cis-1,2-DCE	11/20/2001	5.6	<0.5	100	5.6	205.05	775.089	4340.4984	8000	1.91603E-05	225.01	0.50

Table 2a
System Evaluation for North Treatment System

Coleman Operable Unit
Wichita, Kansas

GROUNDWATER RECOVERY SYSTEM EFFICIENCY					MASS REMOVED				AIR EMISSIONS			
CONSTITUENT	DATE	RW-1 (ug/l)	AS-1-EFF (ug/l)	% EFF	Concentration (ug/l)	Flow Rate gal/min	Flow Rate l/min	Mass Removal Rate (ug/min)	Air Flow Rate (cfm)	Air Emissions Rate (g/m3)	Monthly Air Emissions (g)	Monthly Air Emissions (lbs)
TCE	12/26/2001	154	<0.5	100	154	198.07	748.7046	115300.5084	8000	0.000508972	5645.19	12.45
PCE	12/26/2001	<0.5	<0.5	NC	0	198.07	748.7046	0	8000	0	0.00	0.00
TCA111	12/26/2001	23.2	<0.5	100	23.2	198.07	748.7046	17369.94672	8000	7.66763E-05	850.44	1.88
1,1-DCE	12/26/2001	7.3	<0.5	100	7.3	198.07	748.7046	5465.54358	8000	2.41266E-05	267.60	0.59
Vinyl chloride	12/26/2001	<0.5	<0.5	NC	0	198.07	748.7046	0	8000	0	0.00	0.00
cis-1,2-DCE	12/26/2001	6.3	<0.5	100	6.3	198.07	748.7046	4716.83898	8000	2.08216E-05	230.94	0.51
TCE	1/29/2002	144	<0.5	100	144	208.88	789.5664	113697.5616	8000	0.000501896	3438.26	7.58
PCE	1/29/2002	1	<0.5	100	1	208.88	789.5664	789.5664	8000	3.48539E-06	23.88	0.05
TCA111	1/29/2002	19.8	<0.5	100	19.8	208.88	789.5664	15633.41472	8000	6.90107E-05	472.76	1.04
1,1-DCE	1/29/2002	6.4	<0.5	100	6.4	208.88	789.5664	5053.22496	8000	2.23065E-05	152.81	0.34
Vinyl chloride	1/29/2002	<0.5	<0.5	NC	0	208.88	789.5664	0	8000	0	0.00	0.00
cis-1,2-DCE	1/29/2002	6.2	<0.5	100	6.2	208.88	789.5664	4895.31168	8000	2.16094E-05	148.04	0.33
TCE	2/19/2002	143	<0.5	100	143	200.00	756	108108	8000	0.000477222	5915.75	13.04
PCE	2/19/2002	<0.5	<0.5	NC	0	200.00	756	0	8000	0	0.00	0.00
TCA111	2/19/2002	20.3	<0.5	100	20.3	200.00	756	15346.8	8000	6.77455E-05	839.79	1.85
1,1-DCE	2/19/2002	6.6	<0.5	100	6.6	200.00	756	4989.6	8000	2.20256E-05	273.03	0.60
Vinyl chloride	2/19/2002	<0.5	<0.5	NC	0	200.00	756	0	8000	0	0.00	0.00
cis-1,2-DCE	2/19/2002	6.2	<0.5	100	6.2	200.00	756	4687.2	8000	2.06908E-05	256.49	0.57
TCE	3/29/2002	58.5	<0.5	100	58.5	200.00	756	44226	8000	0.000195227	1528.47	3.37
PCE	3/29/2002	1.8	<0.5	100	1.8	200.00	756	1360.8	8000	6.00699E-06	47.03	0.10
TCA111	3/29/2002	17.4	<0.5	100	17.4	200.00	756	13154.4	8000	5.80676E-05	454.62	1.00
1,1-DCE	3/29/2002	4.6	<0.5	100	4.6	200.00	756	3477.6	8000	1.53512E-05	120.19	0.27
Vinyl chloride	3/29/2002	<0.5	<0.5	NC	0	200.00	756	0	8000	0	0.00	0.00
cis-1,2-DCE	3/29/2002	2.6	<0.5	100	2.6	200.00	756	1965.6	8000	8.67677E-06	67.93	0.15
TCE	4/22/2002	96.7	<0.5	100	96.7	124.46	470.4588	45493.36596	8000	0.000200822	1441.25	3.18
PCE	4/22/2002	1.6	<0.5	100	1.6	124.46	470.4588	752.73408	8000	3.3228E-06	23.85	0.05
TCA111	4/22/2002	19.7	<0.5	100	19.7	124.46	470.4588	9268.03836	8000	4.0912E-05	293.62	0.65
1,1-DCE	4/22/2002	6.1	<0.5	100	6.1	124.46	470.4588	2869.79868	8000	1.26682E-05	90.92	0.20
Vinyl chloride	4/22/2002	<0.5	<0.5	NC	0	124.46	470.4588	0	8000	0	0.00	0.00
cis-1,2-DCE	4/22/2002	4.5	<0.5	100	4.5	124.46	470.4588	2117.0646	8000	9.34538E-06	67.07	0.15

Table 2b
System Evaluation for South Treatment System

Coleman Operable Unit
Wichita, Kansas

GROUNDWATER RECOVERY SYSTEM EFFICIENCY					MASS REMOVED				AIR EMISSIONS			
CONSTITUENT	DATE	AS-2-INF (ug/l)	AS-2-EFF (ug/l)	% EFF	Concentration (ug/l)	Flow Rate gal/min	Flow Rate l/min	Mass Removal Rate (ug/min)	Air Flow Rate (cfm)	Air Emissions Rate (g/m3)	Monthly Air Emissions (g)	Monthly Air Emissions (lbs)
TCE	07/31/01	244	<0.5	100	244	366.38	1384.92	337919.6016	8000	0.00149168	7299.16	16.09
PCE	07/31/01	<0.5	<0.5	NC	0	366.38	1384.92	0	8000	0.00000000	0.00	0.00
111TCA	07/31/01	2.8	<0.5	100	2.8	366.38	1384.92	3877.76592	8000	0.00001712	83.76	0.18
11DCE	07/31/01	3.9	<0.5	100	3.9	366.38	1384.92	5401.17396	8000	0.00002384	116.67	0.26
Vinyl Chloride	07/31/01	<0.5	<0.5	NC	0	366.38	1384.92	0	8000	0.00000000	0.00	0.00
cis12DCE	07/31/01	33.8	<0.5	100	33.8	366.38	1384.92	46810.17432	8000	0.00020663	1011.11	2.23
TCE	08/15/01	230	<0.5	100	230	414.58	1567.11	360435.852	8000	0.00159108	17647.18	38.91
PCE	08/15/01	<0.5	<0.5	NC	0	414.58	1567.11	0	8000	0.00000000	0.00	0.00
111TCA	08/15/01	2.6	<0.5	100	2.6	414.58	1567.11	4074.49224	8000	0.00001799	199.49	0.44
11DCE	08/15/01	3.8	<0.5	100	3.8	414.58	1567.11	5955.02712	8000	0.00002629	291.56	0.64
Vinyl Chloride	08/15/01	<0.5	<0.5	NC	0	414.58	1567.11	0	8000	0.00000000	0.00	0.00
cis12DCE	08/15/01	34.7	<0.5	100	34.7	414.58	1567.11	54378.80028	8000	0.00024004	2662.42	5.87
TCE	09/18/01	81.8	<0.5	100	81.8	236.97	895.75	73272.07188	8000	0.00032345	3059.88	6.75
PCE	09/18/01	<0.5	<0.5	NC	0	236.97	895.75	0	8000	0.00000000	0.00	0.00
111TCA	09/18/01	<0.5	<0.5	NC	0	236.97	895.75	0	8000	0.00000000	0.00	0.00
11DCE	09/18/01	0.9	<0.5	100	0.9	236.97	895.75	806.17194	8000	0.00000356	33.67	0.07
Vinyl Chloride	09/18/01	1.8	<0.5	100	1.8	236.97	895.75	1612.34388	8000	0.00000712	67.33	0.15
cis12DCE	09/18/01	25	<0.5	100	25	236.97	895.75	22393.665	8000	0.00009885	935.17	2.06
TCE	10/17/01	246	<0.5	100	246	426.06	1610.51	396184.6728	8000	0.00174888	19397.46	42.77
PCE	10/17/01	<0.5	<0.5	NC	0	426.06	1610.51	0	8000	0.00000000	0.00	0.00
111TCA	10/17/01	2.4	<0.5	100	2.4	426.06	1610.51	3865.21632	8000	0.00001706	189.24	0.42
11DCE	10/17/01	3.9	<0.5	100	3.9	426.06	1610.51	6280.97652	8000	0.00002773	307.52	0.68
Vinyl Chloride	10/17/01	1.7	<0.5	100	1.7	426.06	1610.51	2737.86156	8000	0.00001209	134.05	0.30
cis12DCE	10/17/01	42.1	<0.5	100	42.1	426.06	1610.51	67802.33628	8000	0.00029930	3319.65	7.32
TCE	11/20/01	232	<0.5	100	232	404.61	1529.43	354826.7856	8000	0.00156632	18394.47	40.56
PCE	11/20/01	<0.5	<0.5	NC	0	404.61	1529.43	0	8000	0.00000000	0.00	0.00
111TCA	11/20/01	2.8	<0.5	100	2.8	404.61	1529.43	4282.39224	8000	0.00001890	222.00	0.49
11DCE	11/20/01	4.2	<0.5	100	4.2	404.61	1529.43	6423.58836	8000	0.00002836	333.00	0.73
Vinyl Chloride	11/20/01	<0.5	<0.5	NC	0	404.61	1529.43	0	8000	0.00000000	0.00	0.00
cis12DCE	11/20/01	40.9	<0.5	100	40.9	404.61	1529.43	62553.51522	8000	0.00027613	3242.82	7.15

Table 2b
System Evaluation for South Treatment System

Coleman Operable Unit
Wichita, Kansas

GROUNDWATER RECOVERY SYSTEM EFFICIENCY					MASS REMOVED				AIR EMISSIONS			
CONSTITUENT	DATE	AS-2-INF (ug/l)	AS-2-EFF (ug/l)	% EFF	Concentration (ug/l)	Flow Rate gal/min	Flow Rate l/min	Mass Removal Rate (μ g/min)	Air Flow Rate (cfm)	Air Emissions Rate (g/m ³)	Monthly Air Emissions (g)	Monthly Air Emissions (lbs)
TCE	12/26/01	216	<0.5	100	216	339.22	1282.25	276966.3456	8000	0.00122262	13560.45	29.90
PCE	12/26/01	<0.5	<0.5	NC	0	339.22	1282.25	0	8000	0.00000000	0.00	0.00
111TCA	12/26/01	2.9	<0.5	100	2.9	339.22	1282.25	3718.52964	8000	0.00001641	182.06	0.40
11DCE	12/26/01	3.8	<0.5	100	3.8	339.22	1282.25	4872.55608	8000	0.00002151	238.56	0.53
Vinyl Chloride	12/26/01	<0.5	<0.5	NC	0	339.22	1282.25	0	8000	0.00000000	0.00	0.00
cis12DCE	12/26/01	38.9	<0.5	100	38.9	339.22	1282.25	49879.58724	8000	0.00022018	2442.14	5.38
TCE	01/29/02	216	<0.5	100	216	438.89	1659.00	358344.9072	8000	0.00158185	10836.50	23.89
PCE	01/29/02	<0.5	<0.5	NC	0	438.89	1659.00	0	8000	0.00000000	0.00	0.00
111TCA	01/29/02	2.7	<0.5	100	2.7	438.89	1659.00	4479.31134	8000	0.00001977	135.46	0.30
11DCE	01/29/02	3.7	<0.5	100	3.7	438.89	1659.00	6138.31554	8000	0.00002710	185.63	0.41
Vinyl Chloride	01/29/02	<0.5	<0.5	NC	0	438.89	1659.00	0	8000	0.00000000	0.00	0.00
cis12DCE	01/29/02	38.2	<0.5	100	38.2	438.89	1659.00	63373.96044	8000	0.00027975	1916.45	4.23
TCE	02/19/02	211	<0.5	100	211	200.00	756.00	159516	8000	0.00070415	8728.83	19.25
PCE	02/19/02	<0.5	<0.5	NC	0	200.00	756.00	0	8000	0.00000000	0.00	0.00
111TCA	02/19/02	2.7	<0.5	100	2.7	200.00	756.00	2041.2	8000	0.00000901	111.70	0.25
11DCE	02/19/02	3.7	<0.5	100	3.7	200.00	756.00	2797.2	8000	0.00001235	153.06	0.34
Vinyl Chloride	02/19/02	<0.5	<0.5	NC	0	200.00	756.00	0	8000	0.00000000	0.00	0.00
cis12DCE	02/19/02	35.1	<0.5	100	35.1	200.00	756.00	26535.6	8000	0.00011714	1452.05	3.20
TCE	03/29/02	187	<0.5	100	187	200.00	756.00	141372	8000	0.00062406	4885.88	10.77
PCE	03/29/02	<0.5	<0.5	NC	0	200.00	756.00	0	8000	0.00000000	0.00	0.00
111TCA	03/29/02	2.1	<0.5	100	2.1	200.00	756.00	1587.6	8000	0.00000701	54.87	0.12
11DCE	03/29/02	3.1	<0.5	100	3.1	200.00	756.00	2343.6	8000	0.00001035	81.00	0.18
Vinyl Chloride	03/29/02	1	<0.5	100	1	200.00	756.00	756	8000	0.00000334	26.13	0.06
cis12DCE	03/29/02	30.2	<0.5	100	30.2	200.00	756.00	22831.2	8000	0.00010078	789.06	1.74
TCE	04/22/02	218	<0.5	100	218	390.98	1477.90	322183.1592	8000	0.00142222	10206.90	22.51
PCE	04/22/02	0.6	<0.5	100	0.6	390.98	1477.90	886.74264	8000	0.00000391	28.09	0.06
111TCA	04/22/02	2.3	<0.5	100	2.3	390.98	1477.90	3399.18012	8000	0.00001501	107.69	0.24
11DCE	04/22/02	3.4	<0.5	100	3.4	390.98	1477.90	5024.87496	8000	0.00002218	159.19	0.35
Vinyl Chloride	04/22/02	1.2	<0.5	100	1.2	390.98	1477.90	1773.48528	8000	0.00000783	56.18	0.12
cis12DCE	04/22/02	35.9	<0.5	100	35.9	390.98	1477.90	53056.76796	8000	0.00023421	1680.86	3.71

Table 2b
System Evaluation for South Treatment System

Coleman Operable Unit
Wichita, Kansas

GROUNDWATER RECOVERY SYSTEM EFFICIENCY					MASS REMOVED				AIR EMISSIONS			
CONSTITUENT	DATE	AS-2-INF (ug/l)	AS-2-EFF (ug/l)	% EFF	Concentration (ug/l)	Flow Rate gal/min	Flow Rate l/min	Mass Removal Rate (ug/min)	Air Flow Rate (cfm)	Air Emissions Rate (g/m3)	Monthly Air Emissions (g)	Monthly Air Emissions (lbs)
TCE	05/14/02	40	<0.5	100	40	419.21	1584.61	63384.552	8000	0.00027980	3194.62	7.04
PCE	05/14/02	<0.5	<0.5	NC	0	419.21	1584.61	0	8000	0.00000000	0.00	0.00
111TCA	05/14/02	<0.5	<0.5	NC	0	419.21	1584.61	0	8000	0.00000000	0.00	0.00
11DCE	05/14/02	<0.5	<0.5	NC	0	419.21	1584.61	0	8000	0.00000000	0.00	0.00
Vinyl Chloride	05/14/02	<0.5	<0.5	NC	0	419.21	1584.61	0	8000	0.00000000	0.00	0.00
cis12DCE	05/14/02	29	<0.5	100	29	419.21	1584.61	45953.8002	8000	0.00020285	2316.10	5.11
TCE	6/18/2002	NA	<0.5	NC	NC	391.19	NC	NC	8000	NC	NC	NC
PCE	6/18/2002	NA	<0.5	NC	NC	391.19	NC	NC	8000	NC	NC	NC
111TCA	6/18/2002	NA	<0.5	NC	NC	391.19	NC	NC	8000	NC	NC	NC
11DCE	6/18/2002	NA	<0.5	NC	NC	391.19	NC	NC	8000	NC	NC	NC
Vinyl Chloride	6/18/2002	NA	<0.5	NC	NC	391.19	NC	NC	8000	NC	NC	NC
cis12DCE	6/18/2002	NA	<0.5	NC	NC	391.19	NC	NC	8000	NC	NC	NC
TCE	7/2/2002	130	<0.5	100	130	416.34	1573.77	204589.476	8000	0.00090312	10016.84	22.09
PCE	7/2/2002	<2	<0.5	NC	0	416.34	1573.77	0	8000	0.00000000	0.00	0.00
111TCA	7/2/2002	<2	<0.5	NC	0	416.34	1573.77	0	8000	0.00000000	0.00	0.00
11DCE	7/2/2002	2.30	<0.5	100	2.3	416.34	1573.77	3619.65996	8000	0.00001598	177.22	0.39
Vinyl Chloride	7/2/2002	<2	<0.5	NC	0	416.34	1573.77	0	8000	0.00000000	0.00	0.00
cis12DCE	7/2/2002	36.00	<0.5	100	36	416.34	1573.77	56655.5472	8000	0.00025010	2773.89	6.12
TCE	8/5/2002	120	<0.5	100	120	417.89	1579.62	189554.904	8000	0.00083675	8188.88	18.06
PCE	8/5/2002	<2	<0.5	NC	0	417.89	1579.62	0	8000	0.00000000	0.00	0.00
111TCA	8/5/2002	<2	<0.5	NC	0	417.89	1579.62	0	8000	0.00000000	0.00	0.00
11DCE	8/5/2002	<2	<0.5	NC	0	417.89	1579.62	0	8000	0.00000000	0.00	0.00
Vinyl Chloride	8/5/2002	<2	<0.5	NC	0	417.89	1579.62	0	8000	0.00000000	0.00	0.00
cis12DCE	8/5/2002	36.00	<0.5	100	36	417.89	1579.62	56866.4712	8000	0.00025103	2456.66	5.42
TCE	9/4/2002	200	<0.5	100	200	424.31	1603.89	320778.36	8000	0.00141601	12933.96	28.52
PCE	9/4/2002	<2	<0.5	NC	0	424.31	1603.89	0	8000	0.00000000	0.00	0.00
111TCA	9/4/2002	<2	<0.5	NC	0	424.31	1603.89	0	8000	0.00000000	0.00	0.00
11DCE	9/4/2002	<2	<0.5	NC	0	424.31	1603.89	0	8000	0.00000000	0.00	0.00
Vinyl Chloride	9/4/2002	<2	<0.5	NC	0	424.31	1603.89	0	8000	0.00000000	0.00	0.00
cis12DCE	9/4/2002	44.00	<0.5	100	44	424.31	1603.89	70571.2392	8000	0.00031152	2845.47	6.27

Table 2b
System Evaluation for South Treatment System

Coleman Operable Unit
Wichita, Kansas.

GROUNDWATER RECOVERY SYSTEM EFFICIENCY					MASS REMOVED				AIR EMISSIONS			
CONSTITUENT	DATE	AS-2-INF (ug/l)	AS-2-EFF (ug/l)	% EFF	Concentration (ug/l)	Flow Rate gal/min	Flow Rate l/min	Mass Removal Rate (µg/min)	Air Flow Rate (cfm)	Air Emissions Rate (g/m3)	Monthly Air Emissions (g)	Monthly Air Emissions (lbs)
TCE	10/2/2002	160.00	<0.5	100	160	606.17	2291.32	366611.616	8000	0.00161834	17949.55	39.58
PCE	10/2/2002	<2	<0.5	NC	0	606.17	2291.32	0	8000	0.00000000	0.00	0.00
TCA111	10/2/2002	<2	<0.5	NC	0	606.17	2291.32	0	8000	0.00000000	0.00	0.00
1,1-DCE	10/2/2002	2.20	<0.5	100	2.2	606.17	2291.32	5040.90972	8000	0.00002225	246.81	0.54
Vinyl chloride	10/2/2002	<2	<0.5	NC	0	606.17	2291.32	0	8000	0.00000000	0.00	0.00
cis-1,2-DCE	10/2/2002	48.00	<0.5	100	48	606.17	2291.32	109983.4848	8000	0.00048550	5384.86	11.87
TCE	11/5/2002	170.00	<0.5	100	170	273.80	1034.96	175943.88	8000	0.00077667	7094.15	15.64
PCE	11/5/2002	<2	<0.5	NC	0	273.80	1034.96	0	8000	0.00000000	0.00	0.00
TCA111	11/5/2002	<2	<0.5	NC	0	273.80	1034.96	0	8000	0.00000000	0.00	0.00
1,1-DCE	11/5/2002	<2	<0.5	NC	0	273.80	1034.96	0	8000	0.00000000	0.00	0.00
Vinyl chloride	11/5/2002	<2	<0.5	NC	0	273.80	1034.96	0	8000	0.00000000	0.00	0.00
cis-1,2-DCE	11/5/2002	42.00	<0.5	100	42	273.80	1034.96	43468.488	8000	0.00019188	1752.67	3.86
TCE	12/3/2002	150.00	<0.5	100	150	468.23	1769.91	265486.41	8000	0.00117194	13380.70	29.50
PCE	12/3/2002	<2	<0.5	NC	0	468.23	1769.91	0	8000	0.00000000	0.00	0.00
TCA111	12/3/2002	<2	<0.5	NC	0	468.23	1769.91	0	8000	0.00000000	0.00	0.00
1,1-DCE	12/3/2002	<2	<0.5	NC	0	468.23	1769.91	0	8000	0.00000000	0.00	0.00
Vinyl chloride	12/3/2002	<2	<0.5	NC	0	468.23	1769.91	0	8000	0.00000000	0.00	0.00
cis-1,2-DCE	12/3/2002	37.00	<0.5	100	37	468.23	1769.91	65486.6478	8000	0.00028908	3300.57	7.28
TCE	1/7/2003	130.00	<0.5	100	130	411.13	1554.0714	202029.282	8000	0.0008918	7855.00	17.32
PCE	1/7/2003	<2	<0.5	NC	0	411.13	1554.0714	0	8000	0.00000000	0.00	0.00
TCA111	1/7/2003	<2	<0.5	NC	0	411.13	1554.0714	0	8000	0.00000000	0.00	0.00
1,1-DCE	1/7/2003	2.00	<0.5	100	2	411.13	1554.0714	3108.1428	8000	0.0000137	120.85	0.27
Vinyl chloride	1/7/2003	<2	<0.5	NC	0	411.13	1554.0714	0	8000	0.00000000	0.00	0.00
cis-1,2-DCE	1/7/2003	34.00	<0.5	100	34	411.13	1554.0714	52838.4276	8000	0.0002332	2054.39	4.53
TCE	2/3/2003	130.00	<0.5	100	130	444.70	1680.966	218525.58	8000	0.0009646	9125.75	20.12
PCE	2/3/2003	<2	<0.5	NC	0	444.70	1680.966	0	8000	0.00000000	0.00	0.00
TCA111	2/3/2003	<2	<0.5	NC	0	444.70	1680.966	0	8000	0.00000000	0.00	0.00
1,1-DCE	2/3/2003	<2	<0.5	NC	0	444.70	1680.966	0	8000	0.00000000	0.00	0.00
Vinyl chloride	2/3/2003	<2	<0.5	NC	0	444.70	1680.966	0	8000	0.00000000	0.00	0.00
cis-1,2-DCE	2/3/2003	31.00	<0.5	100	31	444.70	1680.966	52109.946	8000	0.0002300	2176.14	4.80

Table 2b
System Evaluation for South Treatment System

Coleman Operable Unit
Wichita, Kansas

GROUNDWATER RECOVERY SYSTEM EFFICIENCY					MASS REMOVED				AIR EMISSIONS			
CONSTITUENT	DATE	AS-2-INF (ug/l)	AS-2-EFF (ug/l)	% EFF	Concentration (ug/l)	Flow Rate gal/min	Flow Rate l/min	Mass Removal Rate (ug/min)	Air Flow Rate (cfm)	Air Emissions Rate (g/m3)	Monthly Air Emissions (g)	Monthly Air Emissions (lbs)
TCE	3/4/2003	120.00	<0.5	100	120	444.30	1679.454	201534.48	8000	0.0008896	8125.98	17.92
PCE	3/4/2003	<2	<0.5	NC	0	444.30	1679.454	0	8000	0.0000000	0.00	0.00
TCA111	3/4/2003	<2	<0.5	NC	0	444.30	1679.454	0	8000	0.0000000	0.00	0.00
1,1-DCE	3/4/2003	<2	<0.5	NC	0	444.30	1679.454	0	8000	0.0000000	0.00	0.00
Vinyl chloride	3/4/2003	<2	<0.5	NC	0	444.30	1679.454	0	8000	0.0000000	0.00	0.00
cis-1,2-DCE	3/4/2003	27.00	<0.5	100	27	444.30	1679.454	45345.258	8000	0.0002002	1828.35	4.03
TCE	4/1/2003	140.00	<0.5	100	140	446.31	1687.0518	236187.252	8000	0.0010426	11563.88	25.50
PCE	4/1/2003	<2	<0.5	NC	0	446.31	1687.0518	0	8000	0.0000000	0.00	0.00
TCA111	4/1/2003	<2	<0.5	NC	0	446.31	1687.0518	0	8000	0.0000000	0.00	0.00
1,1-DCE	4/1/2003	<2	<0.5	NC	0	446.31	1687.0518	0	8000	0.0000000	0.00	0.00
Vinyl chloride	4/1/2003	<2	<0.5	NC	0	446.31	1687.0518	0	8000	0.0000000	0.00	0.00
cis-1,2-DCE	4/1/2003	27.00	<0.5	100	27	446.31	1687.0518	45550.3986	8000	0.0002011	2230.18	4.92
TCE	5/5/2003	160.00	<0.5	100	160	435.81	1647.3618	263577.888	8000	0.0011635	11386.72	25.11
PCE	5/5/2003	<1	<0.5	NC	0	435.81	1647.3618	0	8000	0.0000000	0.00	0.00
TCA111	5/5/2003	1.20	<0.5	100	1.2	435.81	1647.3618	1976.83416	8000	0.0000087	85.40	0.19
1,1-DCE	5/5/2003	<1	<0.5	NC	0	435.81	1647.3618	0	8000	0.0000000	0.00	0.00
Vinyl chloride	5/5/2003	<1	<0.5	NC	0	435.81	1647.3618	0	8000	0.0000000	0.00	0.00
cis-1,2-DCE	5/5/2003	24.00	<0.5	100	24	435.81	1647.3618	39536.6832	8000	0.0001745	1708.01	3.77
TCE	6/4/2003	130.00	<0.5	100	140	441.72	1669.7016	233758.224	8000	0.0010319	9088.64	20.04
PCE	6/4/2003	<1	<0.5	NC	0	441.72	1669.7016	0	8000	0.0000000	0.00	0.00
TCA111	6/4/2003	1.1	<0.5	100	0	441.72	1669.7016	0	8000	0.0000000	0.00	0.00
1,1-DCE	6/4/2003	1.5	<0.5	100	0	441.72	1669.7016	0	8000	0.0000000	0.00	0.00
Vinyl chloride	6/4/2003	<1	<0.5	NC	0	441.72	1669.7016	0	8000	0.0000000	0.00	0.00
cis-1,2-DCE	6/4/2003	24.00	<0.5	100	27	441.72	1669.7016	45081.9432	8000	0.0001990	1752.81	3.86
TCE	7/1/2003	140.00	<0.5	100	140	432.23	1633.8294	228736.116	8000	0.0010097	11199.07	24.69
PCE	7/1/2003	<2	<0.5	NC	0	432.23	1633.8294	0	8000	0.0000000	0.00	0.00
TCA111	7/1/2003	<2	<0.5	NC	0	432.23	1633.8294	0	8000	0.0000000	0.00	0.00
1,1-DCE	7/1/2003	<2	<0.5	NC	0	432.23	1633.8294	0	8000	0.0000000	0.00	0.00
Vinyl chloride	7/1/2003	<2	<0.5	NC	0	432.23	1633.8294	0	8000	0.0000000	0.00	0.00
cis-1,2-DCE	7/1/2003	23.00	<0.5	100	23	432.23	1633.8294	37578.0762	8000	0.0001659	1839.85	4.06

Table 2b
System Evaluation for South Treatment System

Coleman Operable Unit
Wichita, Kansas

GROUNDWATER RECOVERY SYSTEM EFFICIENCY					MASS REMOVED				AIR EMISSIONS			
CONSTITUENT	DATE	AS-2-INF (ug/l)	AS-2-EFF (ug/l)	% EFF	Concentration (ug/l)	Flow Rate gal/min	Flow Rate l/min	Mass Removal Rate (μ g/min)	Air Flow Rate (cfm)	Air Emissions Rate (g/m ³)	Monthly Air Emissions (g)	Monthly Air Emissions (lbs)
TCE	12/1/2004	120	<1.0	100	120	104.00	393.12	47174.4	8000	0.0002082	NC	NC
PCE	12/1/2004	<3.3	<1.0	NC	0	104.00	393.12	0	8000	0.0000000	NC	NC
TCA111	12/1/2004	<3.3	<1.0	NC	0	104.00	393.12	0	8000	0.0000000	NC	NC
1,1-DCE	12/1/2004	<3.3	<1.0	NC	0	104.00	393.12	0	8000	0.0000000	NC	NC
Vinyl chloride	12/1/2004	<3.3	<1.0	NC	0	104.00	393.12	0	8000	0.0000000	NC	NC
cis-1,2-DCE	12/1/2004	24	<1.0	100	24	104.00	393.12	9434.88	8000	0.0000416	NC	NC

Notes: NC = Not Calculable NA = Not Available

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Total Mass Removed: 1302964.42 2873.04

Table 3
Comparison of Detections of Trichloroethylene in Ground Water Samples
Point of Compliance Wells

Point of Compliance Well Number	May 1990 TCE (ug/L)	May 1996 TCE (ug/L)	November 2000 TCE (ug/L)	May 2002 TCE (ug/L)	November 2004 TCE (ug/L)
MW-71D (MW-1)*	630	130	2.6	3.9	46
MW-71S (MW-48)**	1800	300	15	34	8.9
MW-3	9.2	0.6	0.5U	0.5U	1.0U
MW-47	7.0	0.4	0.5U	0.5U	1.0U
MW-67	960	120	86	62	1.8
MW-68	850	150	29	46	14
MW-51	17	12	14	NA	3.4
MW-52	20	62	10	10	2.4
MW-59	0.3	NA	0.5U	0.5U	1.0U
MW-60	0.3	NA	0.5U	0.5U	1.0U
MW-15	3500	120	34	15	3.3
MW-45	2200	380	44	91	46
MW-61	310	NA	1.7	10	2.1
MW-62	2300	350	31	150	54

TCE - Trichloroethylene

NA - Not Analyzed

U - Compound not detected

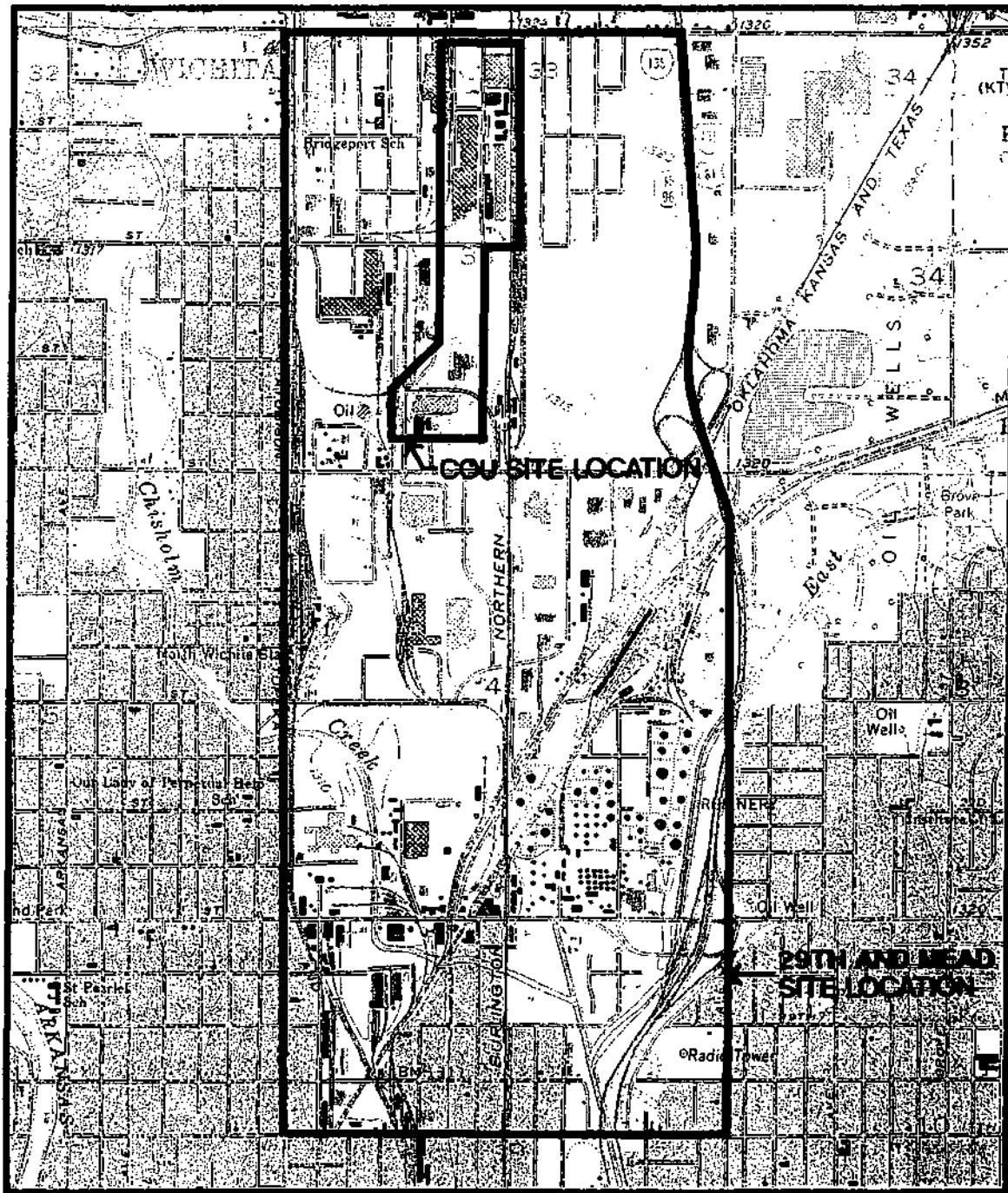
* - MW-71D formerly MW-1

** - MW-71S formerly MW-48

Table 4
Recommendations and Follow-up Actions

Item	Recommendations/ Follow-up Action	Responsible Party	Oversight Agency	Milestone Date	Follow-up Actions: Affects Protectiveness (Yes/No)
Monitoring Program	Continue semiannual monitoring program to verify hydraulic containment and VOC removal. This will continue after the determination of any changes to the existing ground water pump and treat system	New Coleman Holdings, Evcon, Recreational Vehicles	EPA	May and November of each year	Yes
Monitoring Program	Continue semiannual air stripper monitoring program to verify treatment efficiency	New Coleman Holdings, Evcon, Recreational Vehicles	EPA	May and November of each year	Yes
Monitoring Program	Monitor SVE system performance to evaluate system operation	New Coleman Holdings, Evcon, Recreational Vehicles	EPA	Quarterly	Yes
SVE operation	Evaluate continued operation of SVE system	New Coleman Holdings, Evcon, Recreational Vehicles	EPA	As appropriate	Yes

Figures



SCALE 1:24,000

0 2,000 4,000
SCALE FEET

SOURCE:
U.S.G.S. TOPOGRAPHIC QUADRANGLE
WICHITA EAST, KANS.
7.5 MINUTE SERIES
1961/1982



IT CORPORATION
A Member of The IT Group

1950 S. FLORENCE
WICHITA, KANSAS 67209
(316) 943-3444

DESIGNED:

MCH

DETAILED:

MCH

CHECKED:

SITE LOCATION MAP

CLIENT:

NEW COLEMAN HOLDINGS

DRAWING DATE:

11/01/93

LOCATION:

WICHITA, KANSAS

FIGURE:

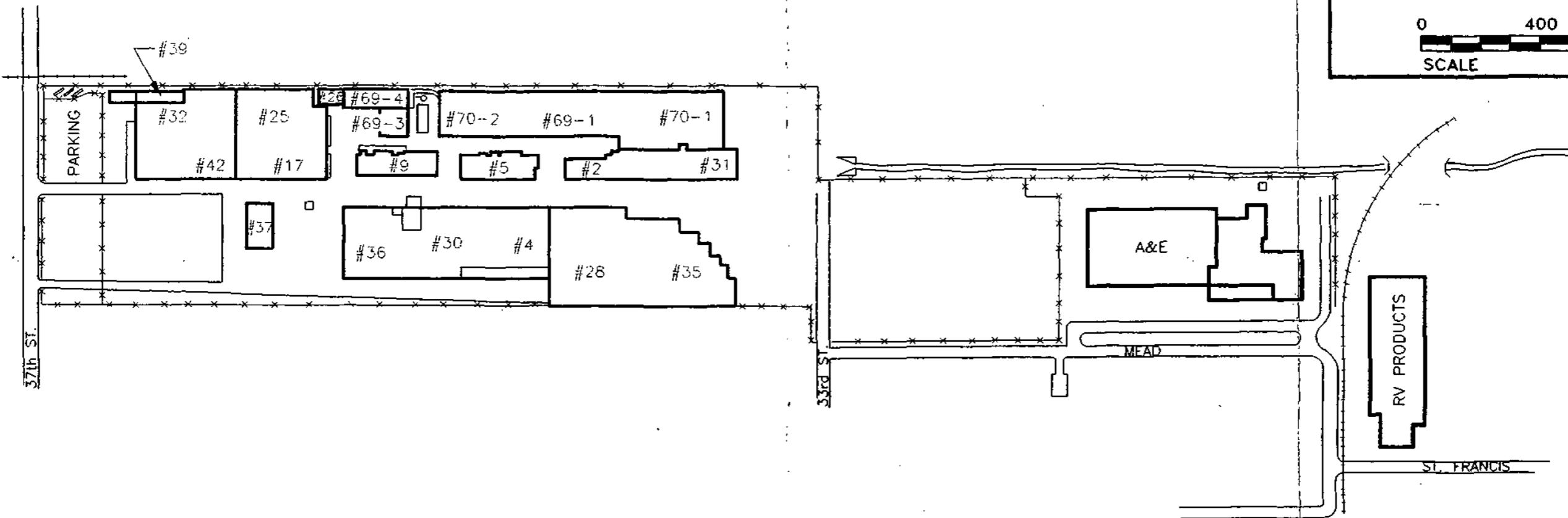
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LEGEND

#4 EVCON BUILDING NUMBER

N

0 400 800
SCALE FEET

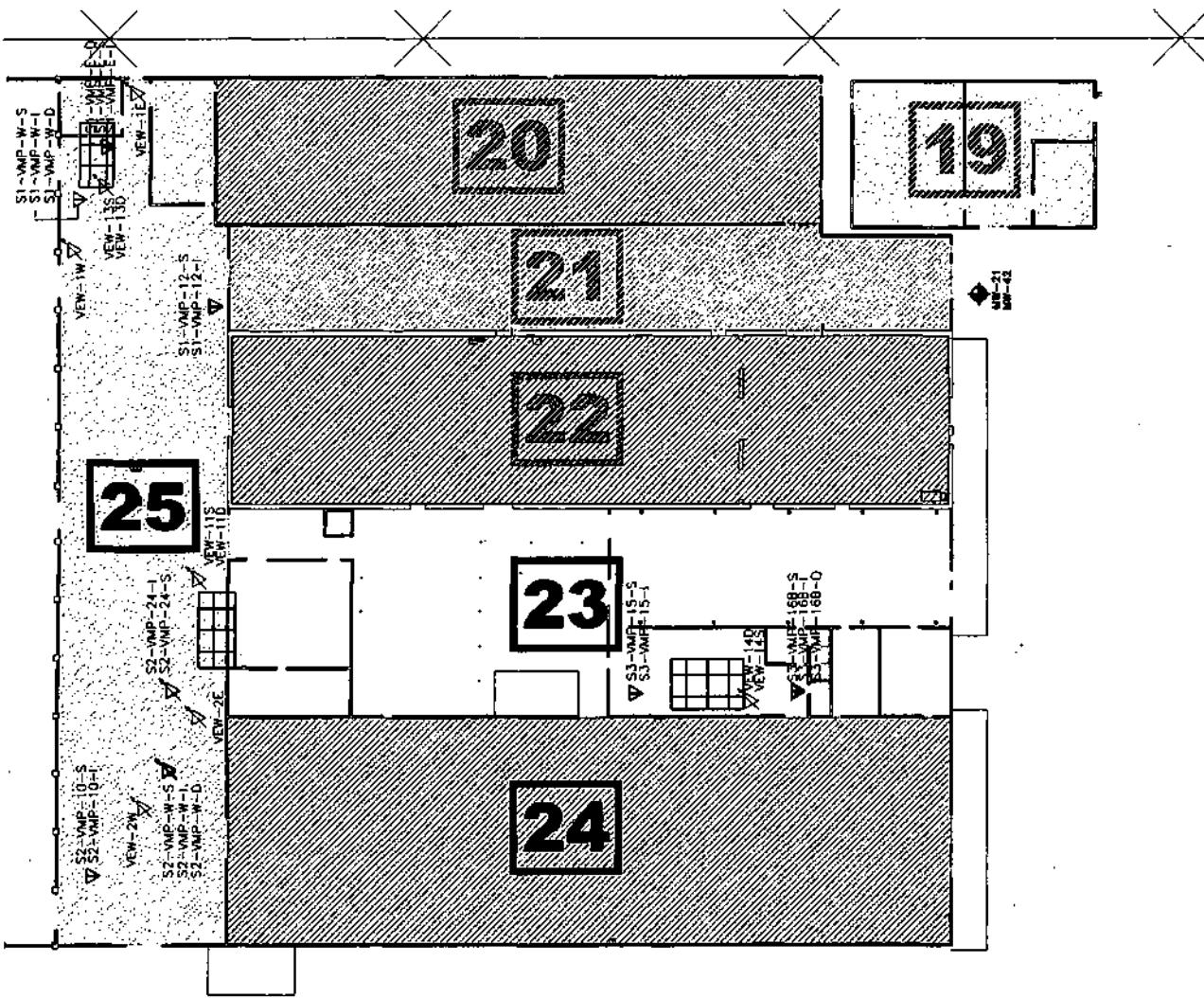


IT CORPORATION 1950 S. FLORENCE
A Member of The IT Group WICHITA, KANSAS 67209
(316) 943-3444

REV. NO.: 1 DRAWING DATE: 8/2/97 ACAD FILE: 0802-SM

COU SITE MAP

CLIENT:	NEW COLEMAN HOLDINGS		PM:	DVL
LOCATION:	OPERABLE UNIT		PE/RG:	
DESIGNED:	DETAILED:	PROJECT NO.:	FIGURE:	2
	RHW	043010154		

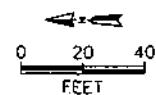


LEGEND

- ◆ MONITORING WELL
- ◆ RECOVERY WELL
- ▼ VAPOR MONITORING POINT
- ▼ VAPOR EXTRACTION WELL
- SUMP LOCATION

NOTES:

SCALE:



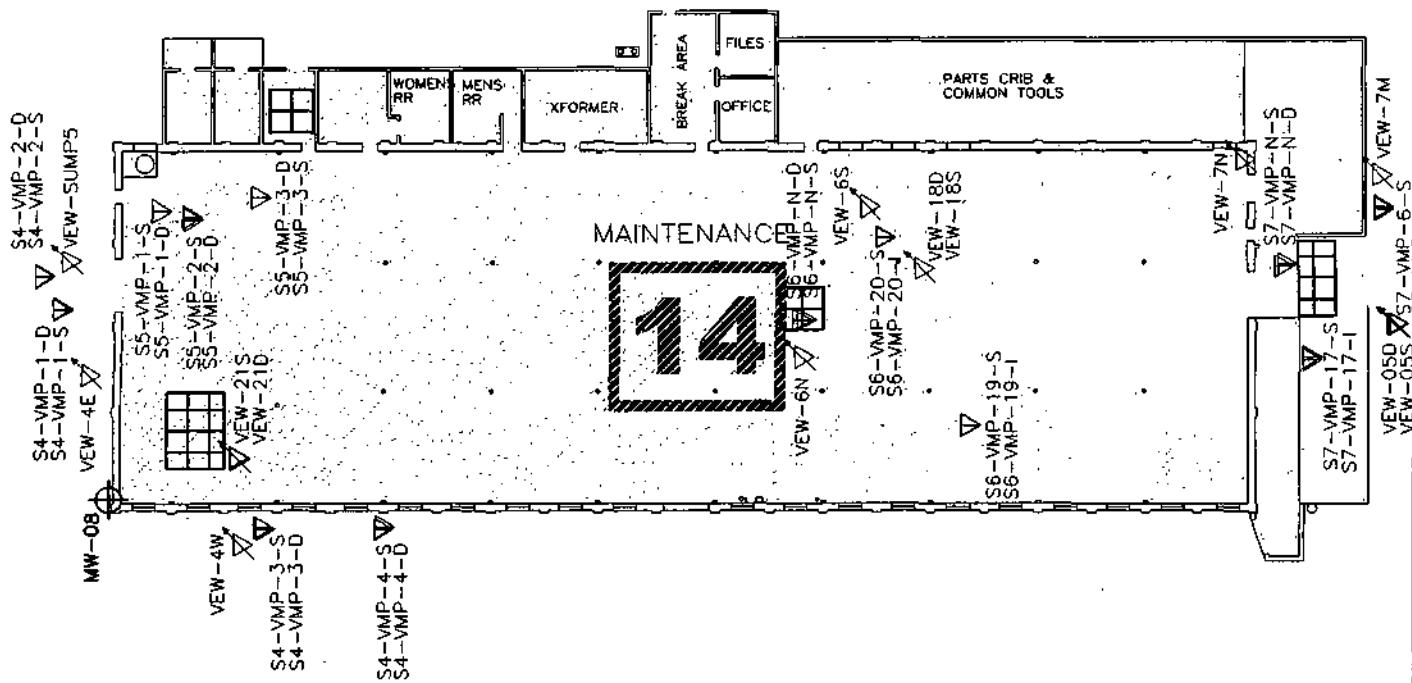
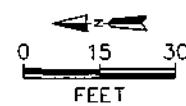
1950 S. FLORENCE WICHITA, KANSAS 67209 (316) 943-3444		
REV. NO.: 1	DRAWING DATE: 10/04/02	ACAD FILE: SUMP123
SUMPS 1,2, and 3 VEWs and VMPs		
CLIENT: NEW COLEMAN HOLDINGS		PM: KH
LOCATION: COLEMAN OPERABLE UNIT WICHITA, KANSAS		PE/RG: PE/RG
DESIGNED: DW	DETAILED: SH	PROJECT NO.: 108972
		FIGURE 3

LEGEND

- ◆ MONITORING WELL
- * RECOVERY WELL
- ▼ VAPOR MONITORING POINT
- ✗ VAPOR EXTRACTION WELL
- █ SUMP LOCATION

NOTES:

SCALE:



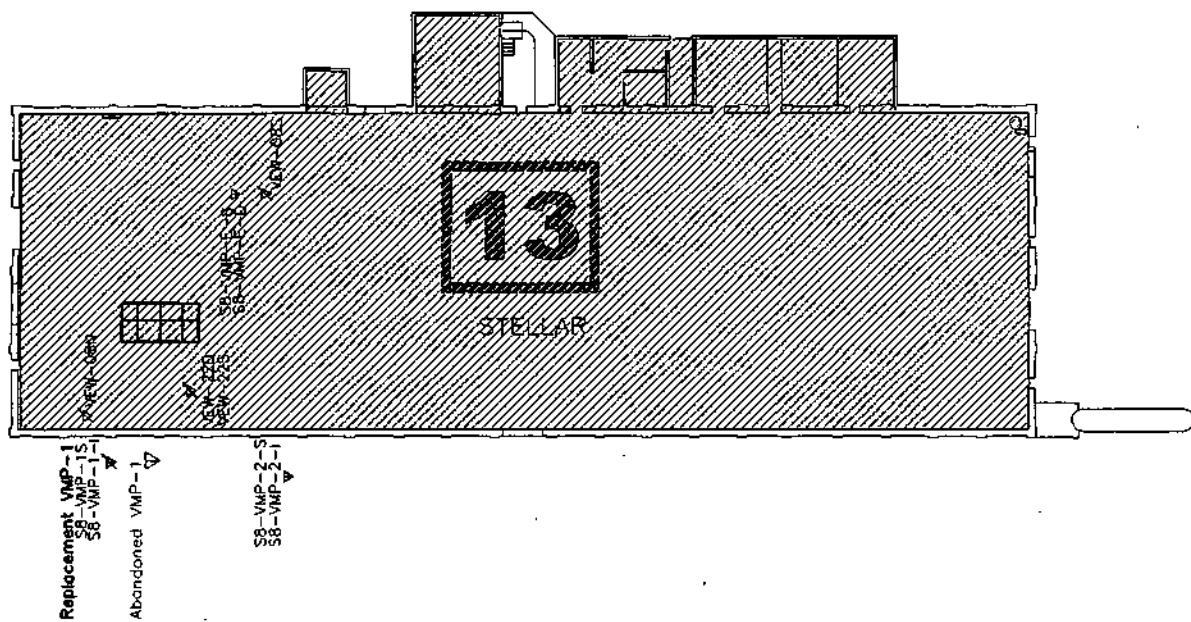
Shaw Environmental, Inc.		
1950 S. FLORENCE WICHITA, KANSAS 67209 (316) 943-3444		
REV. NO.: 1	DRAWING DATE: 10/04/02	ACAD FILE: SUMP4567
SUMP 4,5,6 and 7 VEWs and VMPs		
CLIENT: NEW COLEMAN HOLDINGS		PM: KH
LOCATION: COLEMAN OPERABLE UNIT WICHITA, KANSAS		PE/RG:
DESIGNED: DW	DETAILED: SH	PROJECT NO.: 108972
		FIGURE: 4

LEGEND

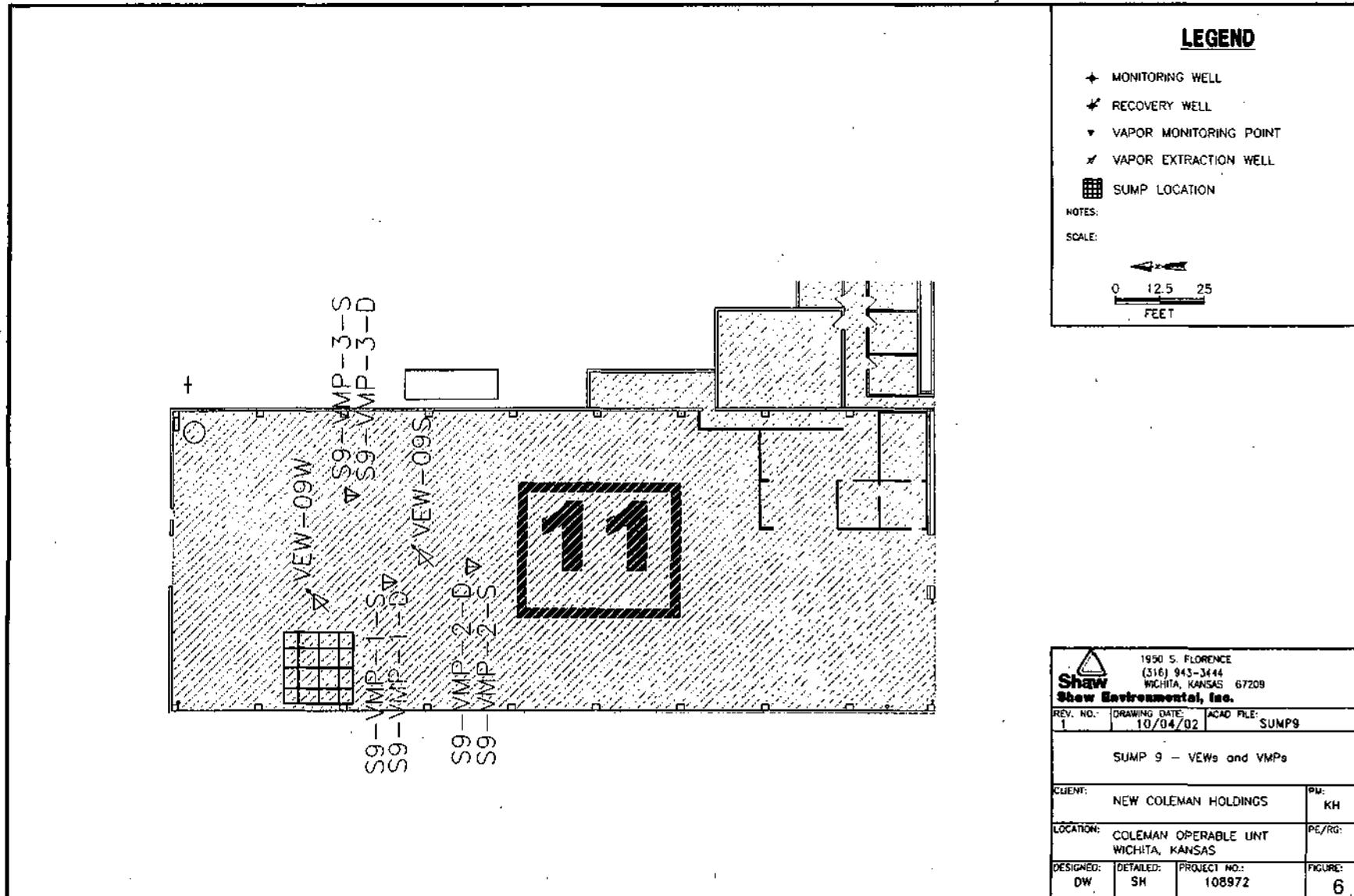
- ♦ MONITORING WELL
- ♦ RECOVERY WELL
- ▼ VAPOR MONITORING POINT
- ✓ VAPOR EXTRACTION WELL
- SUMP LOCATION

NOTES:

SCALE:



Shaw Environmental, Inc.		
1950 S. FLORENCE (316) 943-3444 WICHITA, KANSAS 67209		
REV. NO.: 1 DRAWING DATE: 10/04/02 ACAD FILE: SUMP8		
SUMP 8 - VEWs and VMPs		
CLIENT:	NEW COLEMAN HOLDINGS	PM: KH
LOCATION:	COLEMAN OPERABLE UNIT WICHITA, KANSAS	PE/RG:
DESIGNED:	DW SH	PROJECT NO.: 108972 FIGURE: 5

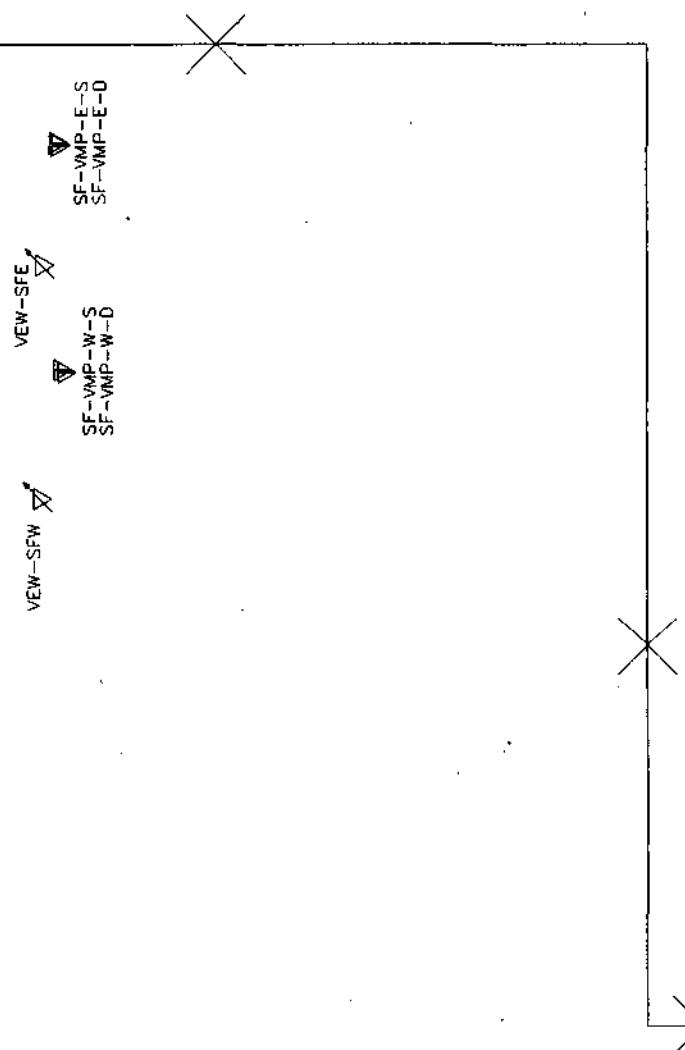
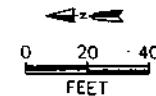


LEGEND

- ◆ MONITORING WELL
- ◆ RECOVERY WELL
- ▼ VAPOR MONITORING POINT
- ✓ VAPOR EXTRACTION WELL

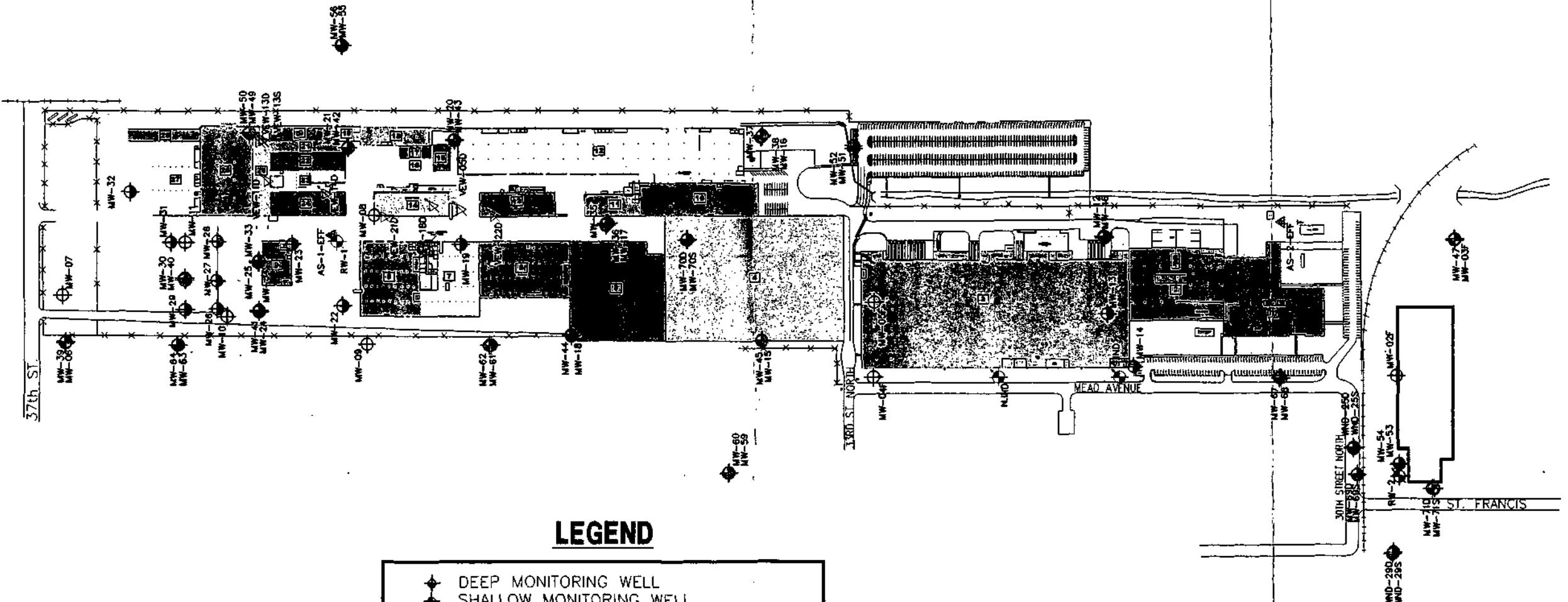
NOTES:

SCALE:



1950 S. FLORENCE (316) 943-3444 WICHITA, KANSAS 67209 Shaw Environmental, Inc.		
REV. NO.: 1	DRAWING DATE: 05/15/00	ACAD FILE: SOUTHFIELD
SOUTH FIELD VEWs and VMPs		
CLIENT: NEW COLEMAN HOLDINGS	PM: KH	
LOCATION: COLEMAN OPERABLE UNIT WICHITA, KANSAS	PE/RG:	
DESIGNED: DW	DETAILED: SH	PROJECT NO.: 108972
		FIGURE: 7

N



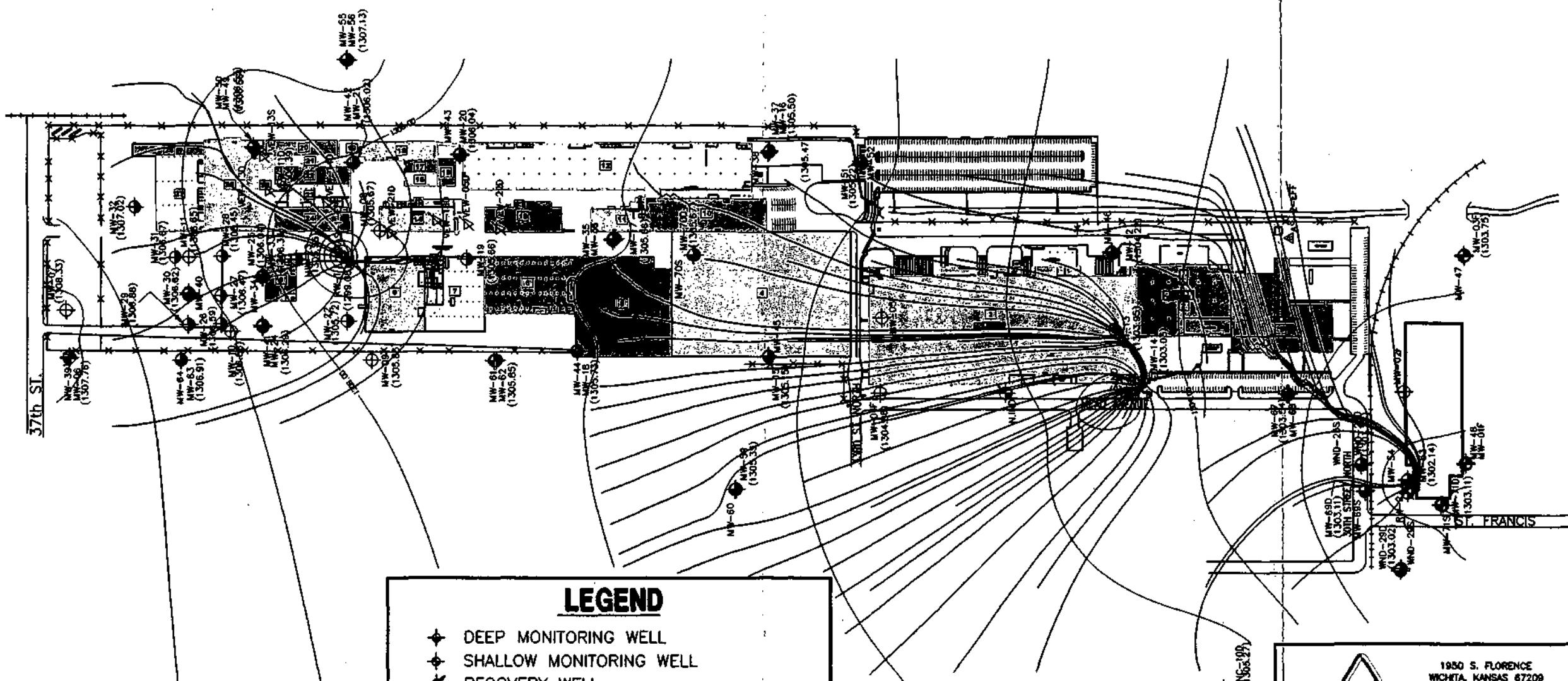
LEGEND

- ◆ DEEP MONITORING WELL
- ◆ SHALLOW MONITORING WELL
- ◆ DEEP MONITORING WELL FOR GW MONITORING PROGRAM
- ◆ SHALLOW MONITORING WELL FOR GW MONITORING PROGRAM
- ◆ RECOVERY WELL
- ◆ RECOVERY WELL FOR GW MONITORING PROGRAM
- ◆ FULLY PENETRATING MONITORING WELL
- ▲ AIR STRIPPER (AS-2)
- ✓ VAPOR EXTRACTION WELL
- ✓ VAPOR EXTRACTION WELL FOR GW MONITORING PROGRAM

BENCHMARK = TOP OF PIPE IN CENTER OF NORTHWEST
DRIVE ENTRANCE, ELEVATION = 1322.12.
400 0 400 800
SCALE FEET

 Shaw Environmental, Inc.		
REV. NO.: 1	DRAWING DATE: 11/19/02	ACAD FILE: GWSamplingMap1102
LOCATIONS OF MONITORING WELLS FOR GROUNDWATER MONITORING & POINT OF COMPLIANCE PROGRAMS		
CLIENT: NEW COLEMAN HOLDINGS		PM: KH
LOCATION: COLEMAN OPERABLE UNIT		PE/RG:
DESIGNED:	DETAILED: JD	PROJECT NO.: 108972
FIGURE: 8		

N



LEGEND

- ◆ DEEP MONITORING WELL
- ◆ SHALLOW MONITORING WELL
- ◆ RECOVERY WELL
- ◆ FULLY PENETRATING MONITORING WELL
- △ AIR STRIPER (AS-2)
- ✗ VAPOR EXTRACTION WELL
- (1305.06) GROUNDWATER ELEVATION
- ~~ GROUNDWATER CONTOUR

NOTE: MW-04F POSTED DATA ONLY,
NOT USED FOR CONTOURING

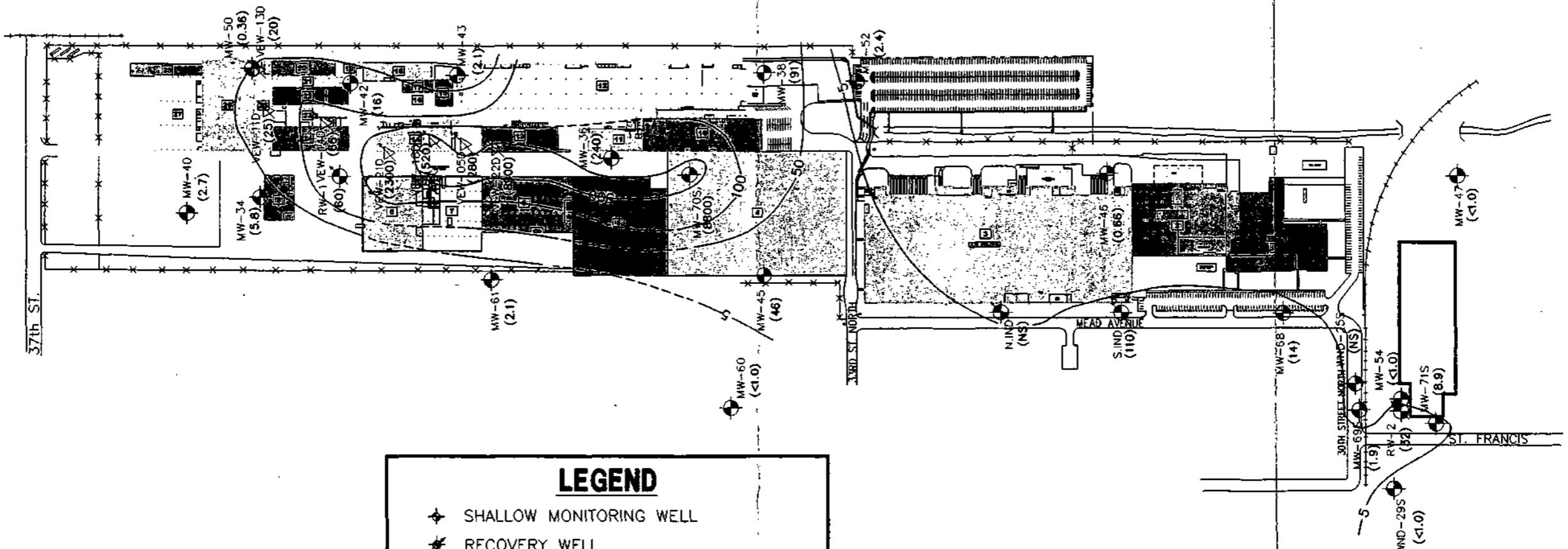
400 0 400 800
SCALE FEET

BENCHMARK = TOP OF PIPE IN CENTER OF NORTHWEST

DRIVE ENTRANCE, ELEVATION = 1322.12.

Shaw Environmental, Inc.		
1950 S. FLORENCE WICHITA, KANSAS 67209 (316) 943-3444		
REV. NO.: 1	DRAWING DATE: 01/06/05	ACAD FILE: gwf1104
GROUNDWATER FLOW DIRECTION MAP - NOVEMBER 2004		
CLIENT: NEW COLEMAN HOLDINGS		PM: KH
LOCATION: COLEMAN OPERABLE UNIT		PE/RG:
DESIGNED: SH	DETAILED: JD	PROJECT NO.: 108972
FIGURE: 9		

N



LEGEND

- ◆ SHALLOW MONITORING WELL
- ◆ RECOVERY WELL
- ◆ FULLY PENETRATING MONITORING WELL
- ✓ VAPOR EXTRACTION WELL

(44) TCE CONCENTRATION (ug/L)

NS = Not Sampled

MAXIMUM CONTAMINANT LEVEL FOR
TCE 5 ug/L.

400 0 400 800
SCALE FEET

NOTE: RECOVERY WELLS NOT USED FOR
CONTOURING; POSTED ONLY

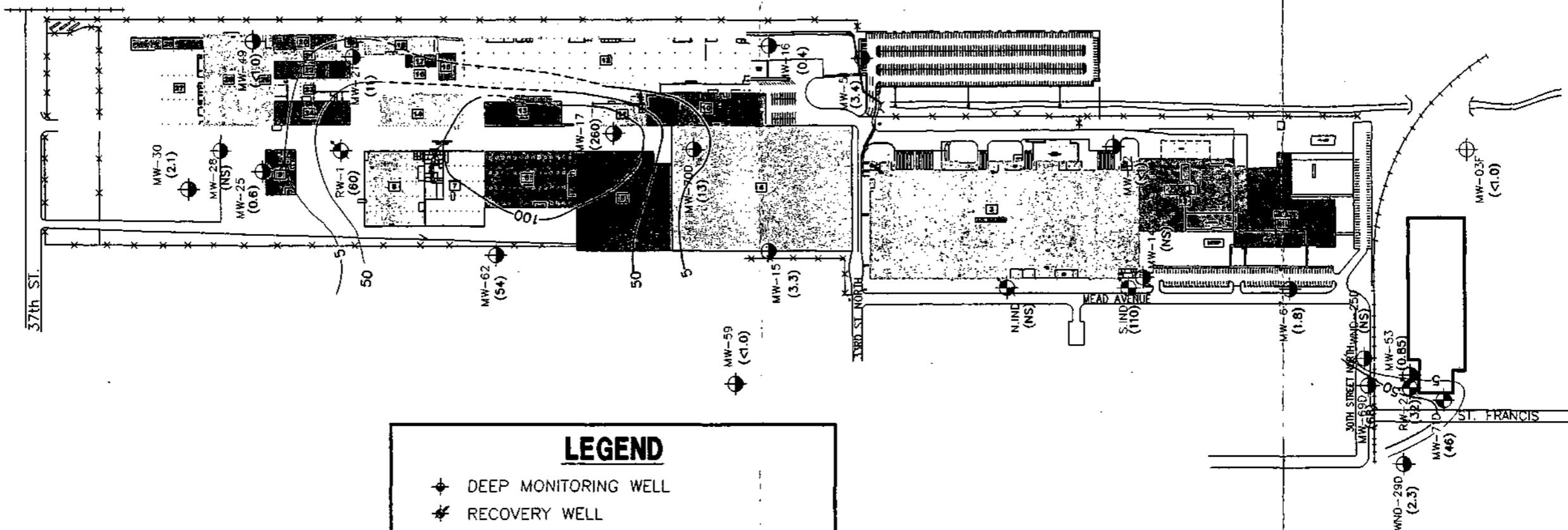
BENCHMARK = TOP OF PIPE IN CENTER OF NORTHWEST
DRIVE ENTRANCE, ELEVATION = 1322.12.

1950 S. FLORENCE
WICHITA, KANSAS 67209
(316) 943-3444

Shaw Environmental, Inc.

REV. NO.: 1	DRAWING DATE: 12/29/04	ACAD FILE: tces1104	
SHALLOW TCE ISOCONCENTRATION MAP			
DATA COLLECTED NOVEMBER 2004			
CLIENT: NEW COLEMAN HOLDINGS	PM: KH		
LOCATION: COLEMAN OPERABLE UNIT	PE/RG:		
DESIGNED: SH	DETAILED: JD	PROJECT NO.: 108972	FIGURE: 10

N



LEGEND

- ◆ DEEP MONITORING WELL
- ◆ RECOVERY WELL
- ◆ FULLY PENETRATING MONITORING WELL

(170) TCE CONCENTRATION (ug/L)

NS = Not Sampled

MAXIMUM CONTAMINANT LEVEL FOR
TCE 5 ug/L.

NOTE: RECOVERY WELLS NOT USED FOR
CONTOURING; POSTED ONLY

BENCHMARK = TOP OF PIPE IN CENTER OF NORTHWEST
DRIVE ENTRANCE, ELEVATION = 1322.12.

400 0 400 800
SCALE FEET

1950 S. FLORENCE WICHITA, KANSAS 67209 (316) 943-3444		
Shaw Environmental, Inc.		
REV. NO.: 1	DRAWING DATE: 12/29/04	ACAD FILE: tced1104
DEEP TCE ISOCONCENTRATION MAP DATA COLLECTED NOVEMBER 2004		
CLIENT: NEW COLEMAN HOLDINGS	PM: KH	
LOCATION: COLEMAN OPERABLE UNIT	PE/RG:	
DESIGNED: SH	DETAILED: JD	PROJECT NO.: 108972
FIGURE: 11		

Total VOCs - MW-71D/MW-71S

Coleman Operable Unit - Wichita, Kansas

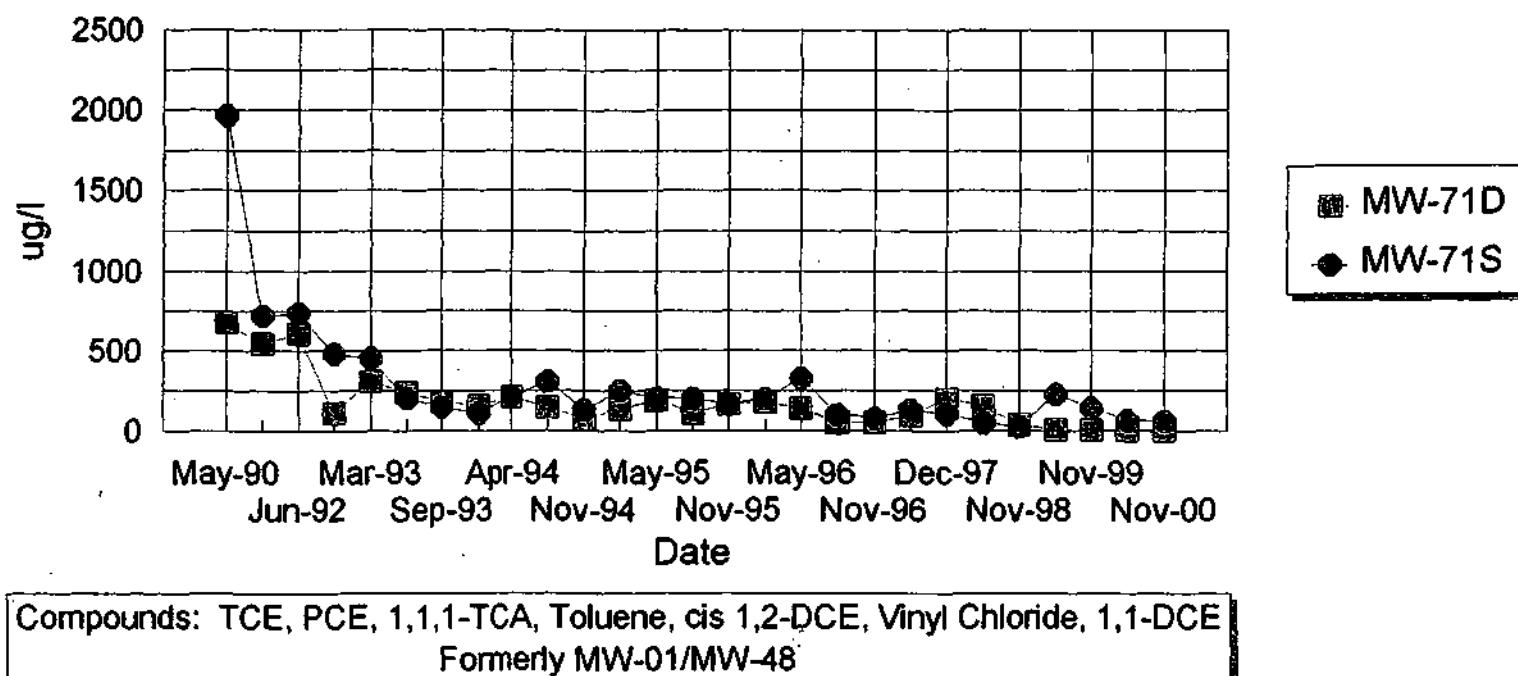


Figure 12

RW-1

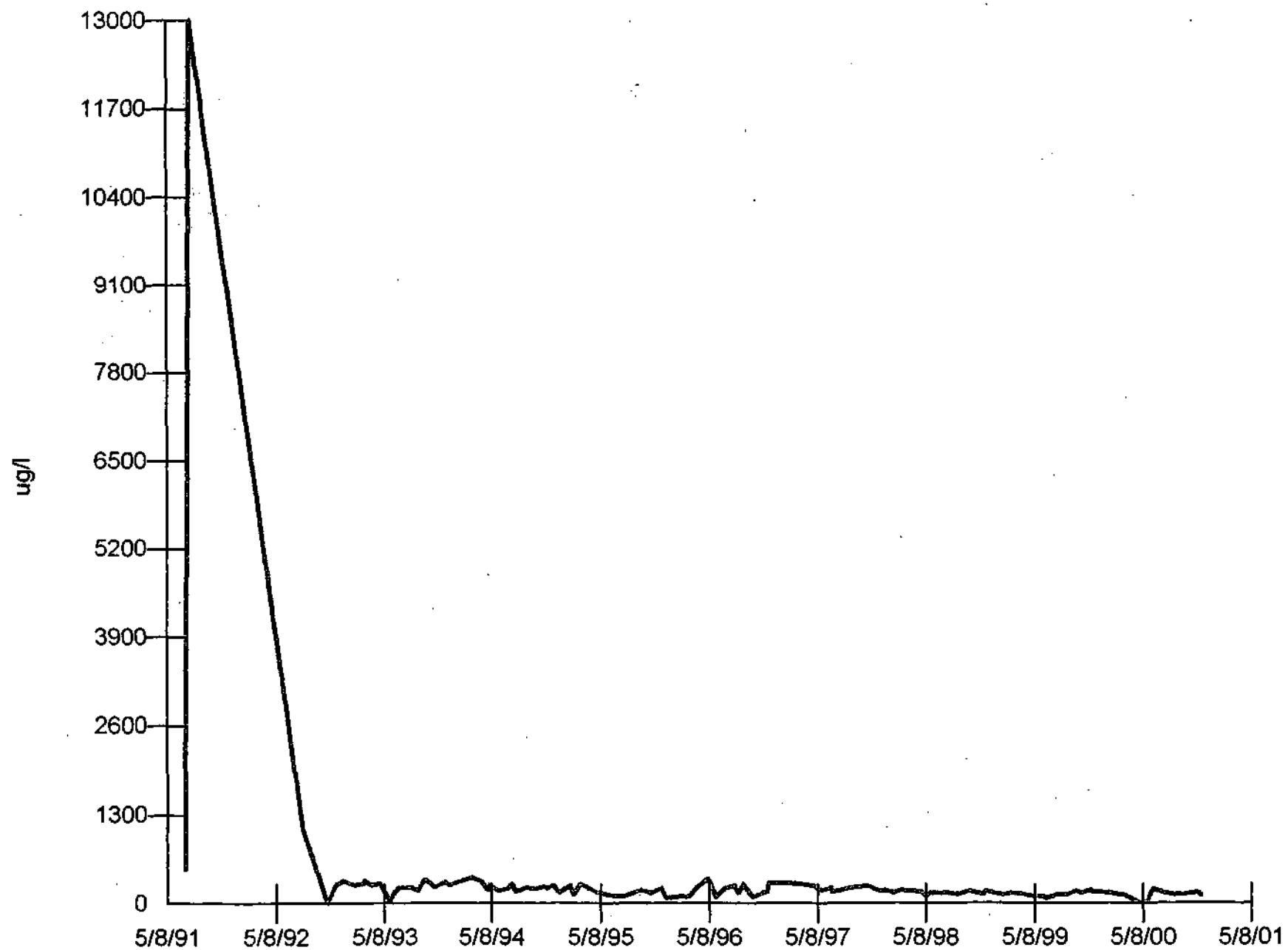


Figure 13

+ Trichloroethylene

RW-2

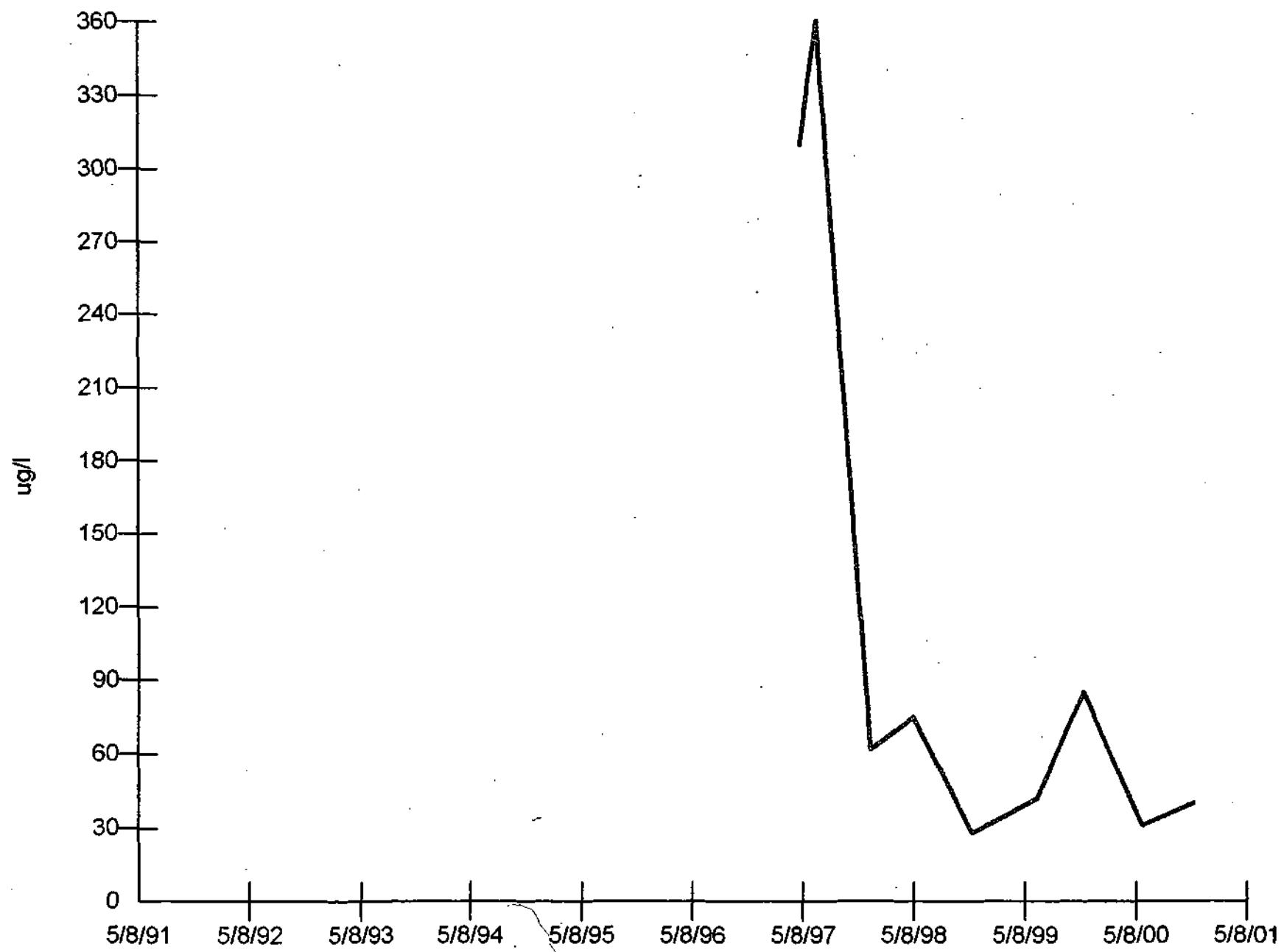


Figure 14

+ Trichloroethylene

Attachments

Attachment 1
Documents Reviewed

Ground Water Technology, Report of Remedial Investigation Activities, Coleman Operable Unit, Wichita, Kansas, September 3, 1991, Revision IV August 27, 1992.

Ground Water Technology, Feasibility Study Report, Coleman Operable Unit, Wichita, Kansas, September 25, 1991, Final July 2, 1992.

PRC Environmental, Risk Assessment for Coleman Operable Unit, Final Report, November 27, 1991

Fluor Daniel GTI, Final Remedial Design and Remedial Action Work Plan, Interim Ground Water Remedy, Coleman Operable Unit, Wichita, Kansas, May 3, 1996, Revised August 20, 1996

Fluor Daniel GTI, Remedial Design and Remedial Action Ground Compliance Monitoring Plan, Coleman Operable Unit, Wichita, Kansas, May 3, 1996

IT Group, Pre-Final Remedial Design and Remedial Action Work Plan, Final Soil Remedy, Coleman Operable Unit, Wichita, Kansas, August 5, 1999

Fluor Daniel GTI, Monthly Data Summary Report of RD/RA Activities, July 2, 1996

IT Group, Coleman Operable Unit, Quarterly Update of RD/RA Activities, January 10, 2001

Shaw Group, Coleman Operable Unit, Quarterly Update of RD/RA Activities, January 10, 2002

Shaw Group, Coleman Operable Unit, Quarterly Update of RD/RA Activities, January 17, 2005

Comprehensive Environmental Response, Compensation, and Liability Act of 1980 as amended by the Superfund Amendments and Reauthorization Act of 1986, 42 U. S. C. § 9601 et seq.

Kansas Department of Health and Environment, 1990, Consent Agreement between the Kansas Department of Health and Environment and the Obee Road PRP Group, March 27, 1990.

United States of America, Plaintiffs v. Evcon Industries, Inc, New Coleman Holdings, Inc., and Recreational Vehicle Products, Inc., Consent Decree, Filed February 18, 1994

National Oil and Hazardous Substances Pollution Contingency Plan, 40 CFR Part 300.

United States Environmental Protection Agency Region VII, Record of Decision, Coleman Operable Unit, 29th and Mead Superfund Site, Wichita, Kansas, September 1992

United States Environmental Protection Agency Region VII, 1994, Interim Remedial Action Report, 29th and Mead Ground Water Contamination Site, Coleman Operable Unit, Wichita, Kansas, September 2000

Attachment 2

EPA Office of Research and Development

Ground Water Report



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NATIONAL RISK MANAGEMENT RESEARCH LABORATORY
GROUND WATER AND ECOSYSTEMS RESTORATION DIVISION
P.O. Box 1198 Ada, OK 74820

OFFICE OF
RESEARCH AND DEVELOPMENT

May 18, 2005

MEMORANDUM

SUBJECT: Five Year Review of the Pump and Treat System for the 29th & Mead Superfund Site – Coleman Operable Unit, Wichita, KS (05-R07-001)

FROM: David S. Burden, Ph.D., Director
Ground Water Technical Support Center

TO: Ken Rappleian, RPM
U.S. EPA Region 7

Introduction

Technical review comments are provided below on documents and quarterly reports associated with the 29th and Mead Superfund Site – Coleman Operable Unit (COU), Wichita, KS. Specifically, the review focused on the data at the compliance points, in addition to all other data, to determine if the pump and treat system is containing the plume. The review was conducted by EPA's contractor to the Ground Water Technical Support Center. Dr. Lifeng Guo, of the Dynamac Corporation reviewed the data and provided technical comments. I have reviewed his comments and concur with them. If after reviewing the comments below you have any questions, please contact me.

The COU is located within an area used since the late 1800s for heavy industrial manufacturing of railroad cars, automobiles, drilling and farm equipment, aircraft, metal fabrication, and recently of household furnace/air conditioning units, and air conditioners for recreational vehicles. The COU consists of the Evcon facilities located at the northern end of the COU, including a manufacturing plant (at 801 East 37th St. North) (approximately 60 percent of the COU), and two areas located at the southern end of the COU: an Administrative and Engineering (A&E) Building (located at 3110 North Mead) (approximately 30 percent of the COU) and the RV Products (located at 3050 North St. Francis). The southern boundary is about 300 feet south of 30th Street North. The remedial investigation indicated that the soil and ground water at the COU were impacted with elevated concentrations of volatile organic chemicals (VOCs). The primary chemicals of concern (COCs) identified include tetrachloroethene (PCE), trichloroethene (TCE), 1,1,1-trichloroethane (TCA), and degradation daughter compounds, namely cis-1,2-dichloroethene (cis-1,2-DCE), and vinyl chloride (VC). As described in the

Record of Decision for the COU, soil vapor extraction (SVE) and ground water extraction were selected to address the contaminated soil in the unsaturated zone and aquifer, respectively.

Summary

Based on the observed ground water contaminant concentrations and water level data at the 29th and Mead Superfund Site – Coleman Operable Unit (COU), Wichita, KS, it appears that the pump and treat system has successfully been working to contain the contaminant plume in the ground water at the southern boundary and off-site to the west of the Evcon facilities on East 37th St. North, and at the southern boundary of the A&E Building on North Mead. However, the pump and treat system has failed to prevent the contaminant plume from migrating off the western boundary of the Evcon facilities on East 37th Street North, and the western boundaries of the A&E Building on North Mead and the RV Products on North St. Francis. Two recommendations are suggested to correct the out of compliance situations at certain monitoring wells and speed-up the remediation processes: 1) consider adding or converting monitoring well MW-70 into an extraction well to address the contaminated water located between VEW-21D and MW-70S in the central portion of the Evcon facilities on East 37th St. North; and 2) modify the pumping operation, such as employing a pulsed pumping schedule and/or with a higher pumping rate to mobilize the contaminated waters located in and around the stagnation zones (especially at RW-2).

General Comments

The installed ground water pump and treatment system at the COU consists of three extraction wells (two recovery wells and one industrial well), with RW-1 located near the contaminant source area, the industrial well downgradient at the western boundary of the A&E Building, and RW-2 further downgradient. This combined source control, mid-plume, and downgradient pumping arrangement represents one of the most efficient designs of a pump-out system, as it reduces the flowpath and travel time of contaminants to extraction wells and prevents further spreading of contaminants in the aquifer (Cohen and others, 1997).

A total of seven couplets of monitoring wells were selected as the point-of-compliance (POC) and monitored to verify the effectiveness of hydraulic control and reduction of ground water contaminant concentrations at the site boundaries of the COU, including one couplet off-site to the west. Monitoring data of water quality and water levels, currently collected semi-annually from these POCs, are intended for evaluating if the on-site pump and treat system is containing the plume at the site. Their locations are described below:

MW-61/MW-62 and MW-45/MW-15

Western boundary of the Evcon facilities on East 37th St. North

MW-59/MW-60

Off-site to west of the Evcon facilities on East 37th St. North

MW-51/MW-52	Southern boundary of the Evcon facilities on East 37 th St. North
MW-67/MW-68	Western boundary of the A&E Building on North Mead
MW-3/MW-47	Southern boundary of the A&E Building on North Mead
MW-71(D)/MW-71(S)	Western boundary of the RV Products on North St. Francis

Western boundary and off-site to the west of the Evcon facilities on East 37th Street North

Contamination was detected at both compliance points MW-45 and MW-62 along the western boundary of the Evcon facilities on East 37th Street, with a TCE concentration above the MCL at 46 µg/L and 54 µg/L, respectively, in November 2004. The concentration of TCE in MW-45 decreased from 110 µg/L in November 2001 to 91 µg/L in May 2002 and 31 µg/L in May 2003, and had been varying between 44 µg/L and 64 µg/L since November 2003. At MW-62, the TCE concentration increased from 63 µg/L in November 2001 to 170 µg/L in November 2004, and was down to 71 µg/L in May 2004 and then 54 µg/L in November 2004. The levels of TCE and cis-1,2-DCE in the shallow part of the aquifer shown in MW-61 had been sporadic. TCE was detected at 220 µg/L in May 2003, and had been below 10 µg/L since late 2003, while cis-1,2-DCE decreased from 530 µg/L in May 2002 to 100 µg/L May 2003 and 2.1 µg/L in November 2003, and was back up to 100 µg/L in May 2004. The concentration of cis-1,2-DCE in MW-61 was below the reporting limit in the most recent monitoring.

No chemicals of concern were ever detected at the compliance point MW-59/MW-60 off-site to the west of the Evcon facilities on East 37th St. North.

Southern boundary of the Evcon facilities on East 37th St. North

Monitoring wells MW-51/MW-52 at the southern boundary of the Evcon facilities on East 37th St. North were in compliance. Although low levels of TCE were found in both MW-51 and MW-52, they had been below the MCL of 7 µg/L since May 2003.

Western boundary of the A&E Building on North Mead

The monitoring data collected from the deeper part of the aquifer in MW-68 showed that the concentration of TCE was at 14 µg/L in November 2004. MW-68 was still out of compliance, although a general decreasing trend of TCE had been continuing in both MW-67 and MW-68 since 2002. Monitoring well MW-67 located in the shallow aquifer had been in compliance since late 2003.

Western boundary of the RV Products on North St. Francis

Monitoring well MW-71(D)/MW-71(S) along the western boundary of the RV Products on North St. Francis continued to be out of compliance. The deeper portion of the aquifer was found to have higher contamination levels than the shallow part of the aquifer. For example, TCE in MW-71(D) reached a high of 160 µg/L in November 2003, was down to 52 µg/L in May 2004, and to 46 µg/L in November 2004. In MW-71(S), TCE varied from 28 µg/L in late 2001 to 34 µg/L in May 2002, and stayed between 8.9 µg/L and 16 µg/L in 2003 and 2004. Another chemical of concern, cis-1,2-DCE, was also detected in MW-71(D)/MW-71(S). The level of cis-1,2-DCE dropped to 57 µg/L in late 2004 from 180 µg/L in November 2003 in MW-71(D), and was 8.9 µg/L at MW-71(S) in November 2004.

Southern boundary of the A&E Building on North Mead

No chemicals of concern were ever found above the respective detection limits at MW-47.

By examining flow net maps prepared based on the water level measurements obtained from the seven cluster wells and other on-site monitoring wells, it appears that the out-of-compliance condition at wells MW-71(D)/MW-71(S) and MW-68 may have resulted from some contaminated water not being captured, and/or being located at or near the stagnation zone typically developed downgradient of an extraction well (Keely, 1989). It seems that the relatively small capture zone created by RW-2 may not be effective in preventing the deeper part of contaminated ground water from moving through. Also, monitoring wells MW-71(D)/MW-71(S) are located downgradient of an extraction well (RW-2). The stagnation zones are hydrodynamically isolated from the portion of aquifer with active flow. Once a contaminant migrates into the stagnation zone, transport out of this isolated water primarily occurs by diffusion. A similar situation may occur at MW-68 as it is located downgradient of and near the south industrial well.

Hot Spot and Recovery Well Monitoring

An elongated TCE plume, approximately 1000 feet long, in the shallow aquifer was located immediately downgradient of RW-1. It extended south from VEW-21D to MW-70S in the central portion of the property, with TCE concentrations of 8,800 µg/L in MW-70S and 8,900 µg/L in VEW-22D in November 2004. High TCE concentrations were consistently observed at MW-70S, varying from 11,000 µg/L in May 2003, 5,700 µg/L in November 2003, to 7,100 µg/L in May 2004. Dissolved TCE was also found in the deeper part of the aquifer, with TCE of 260 µg/L at MW-17 and 54 µg/L at MW-62 (located at the western property boundary). In addition to being at or near the stagnation zone formed by RW-1, this TCE plume is also relatively far (approximately 1200 feet) from the downgradient extraction well, the south industrial well. The cleanup of this contaminant plume, therefore, appears to be limited by the relatively slow movement of ground water. Furthermore, it seems that only about half of the capture zone of the south industrial well was in the contaminated area based on recent flow nets.

Further evaluation of capture zones may require that the hydraulic gradient be measured accurately in three dimensions, as the hydraulic influence of an extraction well extends to only a limited depth. In order to shorten the cleanup time, it may be necessary to take a targeted remedial measure to address this plume, such as converting MW-70S to an extraction well.

The relatively small variation of TCE concentrations observed in the extraction well RW-1 (60 to 90 µg/L), RW-2 (22 to 39 µg/L), and to a lesser extent, in the south industrial well (76 to 150 µg/L) for at least the last two years, indicates that the TCE concentration may be approaching a tailing pattern (apparent residual contamination level). Tailing patterns are associated with different physical and chemical processes (i.e., dissolution, diffusion, and desorption) that are active at the site. Diagnosis of the cause of tailing requires careful consideration of site conditions and usually cannot be made by examining concentration-versus-time data alone (Cohen and others, 1997).

The current extraction system, designed based on the initial site conceptual model developed during the remedial investigation phase, has been working successfully to contain the contaminant plume in the ground water at the southern boundary and off-site to the west of the Evcon facilities on East 37th St. North, and at the southern boundary of the A&E Building on North Mead. However, the pump and treat system has not been able to prevent the contaminant plume from migrating off the western boundary of the Evcon facilities on East 37th Street North, and the western boundaries of the A&E Building on North Mead and the RV Products on North St. Francis.

Based on the review presented above, the following recommendations are suggested: 1) consider adding or converting monitoring well MW-70 into an extraction well to address the contaminated water located between VEW-21D to MW-70S in the central portion of the Evcon facilities on East 37th St. North; and 2) modify the pumping operation, such as employing a pulsed pumping and/or with a higher pumping rate to mobilize the contaminated waters located in the stagnation zones.

References

Cohen, R.M., J.W. Mercer, R.M. Greenwald, and M.S. Beljin, 1997. Design guidelines for conventional pump-and-treat systems. Ground Water Issue, EPA/540/S-97/504, U.S. EPA, ORD, R.S. Kerr Environmental Research Laboratory, Ada, OK.

Keely, J.F., 1989. Performance evaluations of pump-and-treat remediation. Ground Water Issue, EPA/540/4-89/005, U.S. EPA, ORD, R.S. Kerr Environmental Research Laboratory, Ada, OK.

cc: Rich Steimle (5102G)
Jeff Johnson, Region 7
Steve Kovac, Region 7

Attachment 3
Site Inspection Checklist

Five-Year Review Site Inspection Checklist

I. SITE INFORMATION			
Site name: 29 th and Mead, Coleman Operable Unit (OU02)	Date of inspection: 9/23/04		
Location and Region: Wichita, Kansas, Region 7	EPA ID: KSD007241656		
Agency, office, or company leading the five-year review: EPA, Region 7, Superfund Division	Weather/temperature: Fair weather, 75° F, 10 mph winds		
Remedy Includes: (Check all that apply) <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> Landfill cover/containment <input type="checkbox"/> Access controls <input type="checkbox"/> Institutional controls <input checked="" type="checkbox"/> Groundwater pump and treatment <input type="checkbox"/> Surface water collection and treatment <input checked="" type="checkbox"/> Other <u>Soil vapor extraction</u> </td> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> Monitored natural attenuation <input type="checkbox"/> Groundwater containment <input type="checkbox"/> Vertical barrier walls </td> </tr> </table> <hr style="border: 0.5px solid black; margin-top: 10px;"/>		<input type="checkbox"/> Landfill cover/containment <input type="checkbox"/> Access controls <input type="checkbox"/> Institutional controls <input checked="" type="checkbox"/> Groundwater pump and treatment <input type="checkbox"/> Surface water collection and treatment <input checked="" type="checkbox"/> Other <u>Soil vapor extraction</u>	<input type="checkbox"/> Monitored natural attenuation <input type="checkbox"/> Groundwater containment <input type="checkbox"/> Vertical barrier walls
<input type="checkbox"/> Landfill cover/containment <input type="checkbox"/> Access controls <input type="checkbox"/> Institutional controls <input checked="" type="checkbox"/> Groundwater pump and treatment <input type="checkbox"/> Surface water collection and treatment <input checked="" type="checkbox"/> Other <u>Soil vapor extraction</u>	<input type="checkbox"/> Monitored natural attenuation <input type="checkbox"/> Groundwater containment <input type="checkbox"/> Vertical barrier walls		
Attachments: <input checked="" type="checkbox"/> Inspection team roster attached <input checked="" type="checkbox"/> Site map attached			
II. INTERVIEWS (Check all that apply)			
1. O&M site manager <u>Mike Wilson</u> <u>Shaw Environmental</u> <u>9/23/04</u> Name Company Date Interviewed <input checked="" type="checkbox"/> at site <input type="checkbox"/> at office <input type="checkbox"/> by phone Phone no. <u>316-943-3444</u> Problems, suggestions; <input type="checkbox"/> Report attached _____			
2. O&M staff <u>Amber LeMaster</u> <u>Shaw Environmental</u> <u>9/23/04</u> Name Company Date Interviewed <input checked="" type="checkbox"/> at site <input type="checkbox"/> at office <input type="checkbox"/> by phone Phone no. <u>316-943-3444</u> Problems, suggestions; <input type="checkbox"/> Report attached _____			

3. **Local regulatory authorities and response agencies** (i.e., State and Tribal offices, emergency response office, police department, office of public health or environmental health, zoning office, recorder of deeds, or other city and county offices, etc.) Fill in all that apply.

Agency Kansas Department of Health and Environment
Contact Randy Carlson Unit Chief/SUPR Unit 9/23/04 785-296-1682
 Name Title Date Phone no.
Problems; suggestions; Report attached _____

Agency Kansas Department of Health and Environment
Contact Chris Jump Unit Chief/Use Control 9/23/04 785-296-1935
 Name Title Date Phone no.
Problems; suggestions; Report attached _____

Agency _____
Contact _____
 Name Title Date Phone no.
Problems; suggestions; Report attached _____

Agency _____
Contact _____
 Name Title Date Phone no.
Problems; suggestions; Report attached _____

4. **Other interviews (optional)** Report attached.

III. ON-SITE DOCUMENTS & RECORDS VERIFIED (Check all that apply)					
1.	O&M Documents	<input checked="" type="checkbox"/> O&M manual	<input checked="" type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	<input type="checkbox"/> N/A
		<input checked="" type="checkbox"/> As-built drawings	<input checked="" type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	<input type="checkbox"/> N/A
		<input type="checkbox"/> Maintenance logs	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A
Remarks - <u>Documents are located at the Shaw offices and were provided during the inspection.</u>					
2.	Site-Specific Health and Safety Plan	<input checked="" type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	<input type="checkbox"/> N/A	
		<input type="checkbox"/> Contingency plan/emergency response plan	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A
Remarks _____					
3.	O&M and OSHA Training Records	<input checked="" type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	<input type="checkbox"/> N/A	
Remarks - <u>O & M manual provided during the inspection.</u>					
4.	Permits and Service Agreements	<input type="checkbox"/> Air discharge permit	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> X N/A
		<input checked="" type="checkbox"/> Effluent discharge	<input checked="" type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	<input type="checkbox"/> N/A
		<input type="checkbox"/> Waste disposal, POTW	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> X N/A
		<input type="checkbox"/> Other permits	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> X N/A
Remarks - <u>NPDES permit and documentation of NPDES compliance provided during review. NPDES permit issued by KDHE and valid from 9/1/01 through 12/31/04. Effluent limitations are the MCLs for VOCs.</u>					
5.	Gas Generation Records	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> X N/A	
Remarks _____					
6.	Settlement Monument Records	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> X N/A	
Remarks _____					
7.	Groundwater Monitoring Records	<input checked="" type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A	
Remarks _____					
8.	Leachate Extraction Records	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> X N/A	
Remarks _____					
9.	Discharge Compliance Records	<input type="checkbox"/> Air	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A
		<input checked="" type="checkbox"/> Water (effluent)	<input checked="" type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	<input type="checkbox"/> N/A
Remarks - <u>NPDES compliance records presented during inspection.</u>					
10.	Daily Access/Security Logs	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input type="checkbox"/> N/A	
Remarks _____					

IV. O&M COSTS

1. O&M Organization

- State in-house Contractor for State
 PRP in-house Contractor for PRP
 Federal Facility in-house Contractor for Federal Facility
 Other _____

2. O&M Cost Records

- Readily available (at Shaw offices) Up to date
 Funding mechanism/agreement in place
Original O&M cost estimate _____ Breakdown attached

Total annual cost by year for review period if available

From _____ To _____	_____ Date	_____ Date	_____ Total cost	<input type="checkbox"/> Breakdown attached
From _____ To _____	_____ Date	_____ Date	_____ Total cost	<input type="checkbox"/> Breakdown attached
From _____ To _____	_____ Date	_____ Date	_____ Total cost	<input type="checkbox"/> Breakdown attached
From _____ To _____	_____ Date	_____ Date	_____ Total cost	<input type="checkbox"/> Breakdown attached
From _____ To _____	_____ Date	_____ Date	_____ Total cost	<input type="checkbox"/> Breakdown attached
From _____ To _____	_____ Date	_____ Date	_____ Total cost	<input type="checkbox"/> Breakdown attached

3. Unanticipated or Unusually High O&M Costs During Review Period

Describe costs and reasons:

V. ACCESS AND INSTITUTIONAL CONTROLS Applicable N/A

A. Fencing

1. Fencing damaged Location shown on site map Gates secured N/A
Remarks _____

B. Other Access Restrictions

1. Signs and other security measures Location shown on site map N/A
Remarks - Guards on duty to provide security for facility.

C. Institutional Controls (ICs)1. **Implementation and enforcement**

Site conditions imply ICs not properly implemented Yes No N/A
Site conditions imply ICs not being fully enforced Yes No N/A

Type of monitoring (e.g., self-reporting, drive by) _____

Frequency _____

Responsible party/agency _____

Contact _____

Name	Title	Date	Phone no.
------	-------	------	-----------

Reporting is up-to-date Yes No N/A

Reports are verified by the lead agency Yes No N/A

Specific requirements in deed or decision documents have been met Yes No N/A

Violations have been reported Yes No N/A

Other problems or suggestions: Report attached

2. **Adequacy**

Remarks _____

ICs are adequate ICs are inadequate N/A

D. General1. **Vandalism/trespassing** Location shown on site map No vandalism evident

Remarks _____

2. **Land use changes on site** N/A

Remarks – General land use has not changed. New manufacturing facilities have been constructed in the past 5 years.

3. **Land use changes off site** N/A

Remarks – General off-site land use has not changed.

VI. GENERAL SITE CONDITIONS**A. Roads** Applicable N/A1. **Roads damaged** Location shown on site map Roads adequate N/A

Remarks _____

B. Other Site Conditions

Remarks

VII. LANDFILL COVERS Applicable N/A**A. Landfill Surface**

1. **Settlement (Low spots)** Location shown on site map Settlement not evident
Areal extent _____ Depth _____
Remarks _____

2. **Cracks** Location shown on site map Cracking not evident
Lengths _____ Widths _____ Depths _____
Remarks _____

3. **Erosion** Location shown on site map Erosion not evident
Areal extent _____ Depth _____
Remarks _____

4. **Holes** Location shown on site map Holes not evident
Areal extent _____ Depth _____
Remarks _____

5. **Vegetative Cover** Grass Cover properly established No signs of stress
 Trees/Shrubs (indicate size and locations on a diagram)
Remarks _____

6. **Alternative Cover (armored rock, concrete, etc.)** N/A
Remarks _____

7. **Bulges** Location shown on site map Bulges not evident
Areal extent _____ Height _____
Remarks _____

8.	Wet Areas/Water Damage	<input type="checkbox"/> Wet areas/water damage not evident <input type="checkbox"/> Wet areas Areal extent _____ <input type="checkbox"/> Ponding Areal extent _____ <input type="checkbox"/> Seeps Areal extent _____ <input type="checkbox"/> Location shown on site map Areal extent _____ <input type="checkbox"/> Soft subgrade Areal extent _____ Remarks _____
9.	Slope Instability	<input type="checkbox"/> Slides <input type="checkbox"/> Location shown on site map <input type="checkbox"/> No evidence of slope instability Areal extent _____ Remarks _____
B. Benches <input type="checkbox"/> Applicable <input type="checkbox"/> N/A (Horizontally constructed mounds of earth placed across a steep landfill side slope to interrupt the slope in order to slow down the velocity of surface runoff and intercept and convey the runoff to a lined channel.)		
1.	Flows Bypass Bench	<input type="checkbox"/> Location shown on site map <input type="checkbox"/> N/A or okay Remarks _____
2.	Bench Breached	<input type="checkbox"/> Location shown on site map <input type="checkbox"/> N/A or okay Remarks _____
3.	Bench Overtopped	<input type="checkbox"/> Location shown on site map <input type="checkbox"/> N/A or okay Remarks _____
C. Letdown Channels <input type="checkbox"/> Applicable <input type="checkbox"/> N/A (Channel lined with erosion control mats, riprap, grout bags, or gabions that descend down the steep side slope of the cover and will allow the runoff water collected by the benches to move off of the landfill cover without creating erosion gullies.)		
1.	Settlement	<input type="checkbox"/> Location shown on site map <input type="checkbox"/> No evidence of settlement Areal extent _____ Depth _____ Remarks _____
2.	Material Degradation	<input type="checkbox"/> Location shown on site map <input type="checkbox"/> No evidence of degradation Material type _____ Areal extent _____ Remarks _____
3.	Erosion	<input type="checkbox"/> Location shown on site map <input type="checkbox"/> No evidence of erosion Areal extent _____ Depth _____ Remarks _____
4.	Undercutting	<input type="checkbox"/> Location shown on site map <input type="checkbox"/> No evidence of undercutting Areal extent _____ Depth _____ Remarks _____

5.	Obstructions	Type _____	<input type="checkbox"/> No obstructions	
	<input type="checkbox"/> Location shown on site map		Areal extent _____	
	Size _____			
	Remarks _____			
6.	Excessive Vegetative Growth	Type _____		
	<input type="checkbox"/> No evidence of excessive growth			
	<input type="checkbox"/> Vegetation in channels does not obstruct flow			
	<input type="checkbox"/> Location shown on site map		Areal extent _____	
	Remarks _____			
D. Cover Penetrations <input type="checkbox"/> Applicable <input type="checkbox"/> N/A				
1.	Gas Vents	<input type="checkbox"/> Active	<input type="checkbox"/> Passive	
	<input type="checkbox"/> Properly secured/locked	<input type="checkbox"/> Functioning	<input type="checkbox"/> Routinely sampled	<input type="checkbox"/> Good condition
	<input type="checkbox"/> Evidence of leakage at penetration		<input type="checkbox"/> Needs Maintenance	
	<input type="checkbox"/> N/A			
	Remarks _____			
2.	Gas Monitoring Probes	<input type="checkbox"/> Functioning	<input type="checkbox"/> Routinely sampled	<input type="checkbox"/> Good condition
	<input type="checkbox"/> Properly secured/locked		<input type="checkbox"/> Needs Maintenance	<input type="checkbox"/> N/A
	<input type="checkbox"/> Evidence of leakage at penetration			
	Remarks _____			
3.	Monitoring Wells (within surface area of landfill)	<input type="checkbox"/> Functioning	<input type="checkbox"/> Routinely sampled	<input type="checkbox"/> Good condition
	<input type="checkbox"/> Properly secured/locked		<input type="checkbox"/> Needs Maintenance	<input type="checkbox"/> N/A
	<input type="checkbox"/> Evidence of leakage at penetration			
	Remarks _____			
4.	Leachate Extraction Wells	<input type="checkbox"/> Functioning	<input type="checkbox"/> Routinely sampled	<input type="checkbox"/> Good condition
	<input type="checkbox"/> Properly secured/locked		<input type="checkbox"/> Needs Maintenance	<input type="checkbox"/> N/A
	<input type="checkbox"/> Evidence of leakage at penetration			
	Remarks _____			
5.	Settlement Monuments	<input type="checkbox"/> Located	<input type="checkbox"/> Routinely surveyed	<input type="checkbox"/> N/A
	Remarks _____			

E. Gas Collection and Treatment <input type="checkbox"/> Applicable <input type="checkbox"/> N/A		
1. Gas Treatment Facilities		
<input type="checkbox"/> Flaring <input type="checkbox"/> Thermal destruction <input type="checkbox"/> Collection for reuse <input type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance Remarks _____		
2. Gas Collection Wells, Manifolds and Piping		
<input type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance Remarks _____		
3. Gas Monitoring Facilities (e.g., gas monitoring of adjacent homes or buildings)		
<input type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance <input type="checkbox"/> N/A Remarks _____		
F. Cover Drainage Layer <input type="checkbox"/> Applicable <input type="checkbox"/> N/A		
1. Outlet Pipes Inspected <input type="checkbox"/> Functioning <input type="checkbox"/> N/A Remarks _____		
2. Outlet Rock Inspected <input type="checkbox"/> Functioning <input type="checkbox"/> N/A Remarks _____		
G. Detention/Sedimentation Ponds <input type="checkbox"/> Applicable <input type="checkbox"/> N/A		
1. Siltation Areal extent _____ Depth _____ <input type="checkbox"/> N/A <input type="checkbox"/> Siltation not evident Remarks _____		
2. Erosion Areal extent _____ Depth _____ <input type="checkbox"/> Erosion not evident Remarks _____		
3. Outlet Works <input type="checkbox"/> Functioning <input type="checkbox"/> N/A Remarks _____		
4. Dam <input type="checkbox"/> Functioning <input type="checkbox"/> N/A Remarks _____		

H. Retaining Walls		<input type="checkbox"/> Applicable <input type="checkbox"/> N/A
1. Deformations <input type="checkbox"/> Location shown on site map <input type="checkbox"/> Deformation not evident		
Horizontal displacement _____ Vertical displacement _____		
Rotational displacement _____		
Remarks _____		
2. Degradation <input type="checkbox"/> Location shown on site map <input type="checkbox"/> Degradation not evident		
Remarks _____		
I. Perimeter Ditches/Off-Site Discharge		<input type="checkbox"/> Applicable <input type="checkbox"/> N/A
1. Siltation <input type="checkbox"/> Location shown on site map <input type="checkbox"/> Siltation not evident		
Areal extent _____ Depth _____		
Remarks _____		
2. Vegetative Growth <input type="checkbox"/> Location shown on site map <input type="checkbox"/> N/A		
<input type="checkbox"/> Vegetation does not impede flow		
Areal extent _____ Type _____		
Remarks _____		
3. Erosion <input type="checkbox"/> Location shown on site map <input type="checkbox"/> Erosion not evident		
Areal extent _____ Depth _____		
Remarks _____		
4. Discharge Structure <input type="checkbox"/> Functioning <input type="checkbox"/> N/A		
Remarks _____		
VIII. VERTICAL BARRIER WALLS <input type="checkbox"/> Applicable <input checked="" type="checkbox"/> N/A		
1. Settlement <input type="checkbox"/> Location shown on site map <input type="checkbox"/> Settlement not evident		
Areal extent _____ Depth _____		
Remarks _____		
2. Performance Monitoring Type of monitoring _____		
<input type="checkbox"/> Performance not monitored		
Frequency _____ <input type="checkbox"/> Evidence of breaching		
Head differential _____		
Remarks _____		

IX. GROUNDWATER/SURFACE WATER REMEDIES		<input checked="" type="checkbox"/> Applicable	<input type="checkbox"/> N/A
A. Groundwater Extraction Wells, Pumps, and Pipelines		<input checked="" type="checkbox"/> Applicable	<input type="checkbox"/> N/A
1.	Pumps, Wellhead Plumbing, and Electrical	<input checked="" type="checkbox"/> Good condition <input checked="" type="checkbox"/> All required wells properly operating <input type="checkbox"/> Needs Maintenance <input type="checkbox"/> N/A Remarks _____ _____	
2.	Extraction System Pipelines, Valves, Valve Boxes, and Other Appurtenances	<input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance Remarks _____	
3.	Spare Parts and Equipment	<input type="checkbox"/> Readily available <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Requires upgrade <input type="checkbox"/> Needs to be provided Remarks _____	
B. Surface Water Collection Structures, Pumps, and Pipelines		<input checked="" type="checkbox"/> Applicable	<input type="checkbox"/> N/A
1.	Collection Structures, Pumps, and Electrical	<input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance Remarks _____	
2.	Surface Water Collection System Pipelines, Valves, Valve Boxes, and Other Appurtenances	<input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance Remarks _____	
3.	Spare Parts and Equipment	<input type="checkbox"/> Readily available <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Requires upgrade <input type="checkbox"/> Needs to be provided Remarks _____	

C. Treatment System		<input checked="" type="checkbox"/> Applicable	<input type="checkbox"/> N/A
1. Treatment Train (Check components that apply)			
<input type="checkbox"/> Metals removal <input type="checkbox"/> Oil/water separation <input type="checkbox"/> Bioremediation <input checked="" type="checkbox"/> Air stripping <input type="checkbox"/> Carbon adsorbers <input type="checkbox"/> Filters _____ <input type="checkbox"/> Additive (e.g., chelation agent, flocculent) _____ <input type="checkbox"/> Others _____ <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance <input checked="" type="checkbox"/> Sampling ports properly marked and functional <input type="checkbox"/> Sampling/maintenance log displayed and up to date <input checked="" type="checkbox"/> Equipment properly identified <input type="checkbox"/> Quantity of groundwater treated annually _____ <input type="checkbox"/> Quantity of surface water treated annually _____ Remarks _____			
2. Electrical Enclosures and Panels (properly rated and functional)			
<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance Remarks _____			
3. Tanks, Vaults, Storage Vessels			
<input checked="" type="checkbox"/> N/A <input type="checkbox"/> Good condition <input type="checkbox"/> Proper secondary containment <input type="checkbox"/> Needs Maintenance Remarks _____			
4. Discharge Structure and Appurtenances			
<input type="checkbox"/> N/A <input checked="" type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance Remarks _____			
5. Treatment Building(s)			
<input checked="" type="checkbox"/> N/A <input type="checkbox"/> Good condition (esp. roof and doorways) <input type="checkbox"/> Needs repair <input type="checkbox"/> Chemicals and equipment properly stored Remarks _____			
6. Monitoring Wells (pump and treatment remedy)			
<input checked="" type="checkbox"/> Properly secured/locked <input checked="" type="checkbox"/> Functioning <input checked="" type="checkbox"/> Routinely sampled <input checked="" type="checkbox"/> Good condition <input checked="" type="checkbox"/> All required wells located <input type="checkbox"/> Needs Maintenance <input type="checkbox"/> N/A Remarks _____			
D. Monitoring Data			
1. Monitoring Data			
<input checked="" type="checkbox"/> Is routinely submitted on time <input type="checkbox"/> Is of acceptable quality			
2. Monitoring data suggests:			
<input checked="" type="checkbox"/> Groundwater plume is effectively contained <input type="checkbox"/> Contaminant concentrations are declining			

E. Monitored Natural Attenuation					
1. Monitoring Wells (natural attenuation remedy)					
<input type="checkbox"/> Properly secured/locked		<input type="checkbox"/> Functioning	<input type="checkbox"/> Routinely sampled	<input type="checkbox"/> Good condition	<input type="checkbox"/> N/A
<input type="checkbox"/> All required wells located		<input type="checkbox"/> Needs Maintenance			
Remarks _____					
X. SOIL VAPOR EXTRACTION					
A. Groundwater Extraction Wells, Pumps, and Pipelines <input checked="" type="checkbox"/> Applicable <input type="checkbox"/> N/A					
1. Blowers, Wellhead Plumbing, and Electrical					
<input checked="" type="checkbox"/> Good condition		<input type="checkbox"/> All required wells properly operating		<input type="checkbox"/> Needs Maintenance	<input type="checkbox"/> N/A
Remarks – <u>Some of the SVE were shut down to test for rebound.</u>					
2. Extraction System Pipelines, Valves, Valve Boxes, and Other Appurtenances					
<input checked="" type="checkbox"/> Good condition		<input type="checkbox"/> Needs Maintenance			
Remarks _____					
3. Collection Structures, Pumps, and Electrical					
<input checked="" type="checkbox"/> Good condition		<input type="checkbox"/> Needs Maintenance			
Remarks _____					
B. Treatment System <input type="checkbox"/> Applicable <input checked="" type="checkbox"/> N/A					
C. Monitoring Data					
3. Monitoring Data					
<input checked="" type="checkbox"/> Is routinely submitted on time			<input checked="" type="checkbox"/> Is of acceptable quality		
4. Monitoring data suggests:					
<input checked="" type="checkbox"/> SVE systems removing soil contamination <input checked="" type="checkbox"/> Contaminant concentrations are declining					